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| CHAPTER: 2500 IMPACT PROCESSING | SECTION: 2500 IMPACT PROCESSING |
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2500.00.00 IMPACT PROCESSING (S, C, I)

This chapter contains IMPACT policy including:

Participation Rates (Section 2505.00.00)

Applicant Services (Section 2510.00.00)

Case Management (Section 2515.00.00)

IMPACT Assessment (Section 2525.00.00)

Self-Sufficiency Plans (Section 2530.00.00)

IMPACT Activities (Section 2540.00.00)

IMPACT Compliance (Section 2545.00.00)

IMPACT Supportive Services (Section 2550.00.00)

2505.00.00 WORK PARTICIPATION RATE (C, I)

The TANF IMPACT Program must meet a specific federally mandated "Work Participation Rate" in order to receive all possible federal funds. The participation rate is defined as the percentage of work-eligible individuals who are meeting all of their required participation hours. Participation hours are defined as the number of hours in which each work-eligible individual is participating in an approved IMPACT activity. All TANF families, not just

those with IMPACT mandatory individuals, are counted in the participation rate calculation.

2505.05.00 TANF WORK PARTICIPATION RATES FOR ALL-FAMILIES (C, I)

The All-Family work participation rate is calculated by dividing the number of Two-Parent TANF and Regular TANF AGs which meet the average number of hours of employment and/or work activities by the total number of Two-Parent TANF and Regular TANF AGs.

If a sanction is imposed (as of 11-1-07, TANF sanctions are full family sanctions) the TANF case is closed and will not be considered in the calculation of the participation rate after the effective date of closure which could be either the end of the current month or the next month.

Certain families are not included in this calculation:

1. AGs headed by single parents with a child under twelve (12) months of age;
2. AGs receiving a \$0 grant due to income, and
3. Child only AGs.

The participation rate for all families is 50%, meaning that 50% of all TANF families must meet the work requirements. The two-parent participation rate is 90%.

Individuals meet the work requirement if one of the following is true:

The case head is an adult who is participating an average of 30 hours per week in work-related activities of which at least 20 hours are in one or more of the "core" activities listed below. In a two-parent family, at least one parent is meeting the preceding work participation requirement.

The case head is age 20 or older and the only parent/caretaker relative of a child under age six (6), and is participating an average of 20 hours per week in "core" activities.

The case head is a teen parent age 19 or under who is either maintaining satisfactory school attendance or involved in education directly related to employment for an average of at least 20 hours per week.

The "core" activities are:

Unsubsidized Employment;

Subsidized Private and Public Sector Employment;

Work Experience (Community Work Experience Program - CWEP);

Community Service;

Vocational Educational Training;

On-the-Job Training, and/or

Job Search/Job Readiness: The federal government has mandated a combined limit of six weeks in Job Search and Job Readiness activities for TANF participants; however, because Indiana has been designated a "needy" state, the combined limit is currently 12 weeks. Only four weeks of participation in any combination of these activities may be consecutive in a rolling 12-month period.

In addition to the specific "core" work activities, recipients may also participate in Job Skills Training or Educational (Academic) Training once they have met the 20 "core" hours per week work requirement. [Educational (Academic) Training is considered a "core" activity for teen heads of household age 19 and under.]

NOTE: As of 10/01/96, Vocational Educational Training may not be counted in the rate if the individual has been in this activity as an IMPACT participant for more than 12 months.

However, **as of 10/01/08**, a change allowing Vocational Educational Training to count toward a bachelor's or other advanced degree (if it has not already been used) eliminates the requirement that the 12 month lifetime limit for Vocational Educational Training be completed within the 24-month limit for Cash Assistance (CA).

Individuals who have used their 12 month lifetime limit for Vocational Educational Training may continue their studies by participating in Job Skills Training which can be counted in the rate if they are concurrently employed (including Work Study), or seeking employment for at least 20 hours per week. (See Sections 2540.10.45 and 2540.10.50 for further clarification.)

IMPACT case managers should continue to assign Vocational Educational Training as an activity if it is appropriate regardless of the reporting limit.

Non-graduate teen parent caretakers:

A non-graduate teen parent/caretaker age 19 and under is considered to be meeting the participation rate requirement when the teen is satisfactorily attending high school or High School Equivalency (HSE) classes (no hourly participation requirement). Satisfactory attendance is defined by the school or institution that the client is attending.

A non-graduate teen parent/caretaker age 19 and under is considered to be meeting the participation rate requirements when the teen participates 20 hours per week in education directly related to employment (Adult Basic Education - ABE, or English as a Second Language - ESL).

Other individuals with children under age six (6) are considered to be meeting the federal participation rate requirement when they participate 20 hours per week in one or more of the above specified work activities.

Work-eligible individuals must participate in work-related activities for an average of 30 hours per week each week of the month. At least 20 hours must be in one or more of the core work activities listed above. The other hours may be in any other activity allowable for TANF participants.

2505.10.00 IMPACT REQUIREMENTS FOR THE TWO-PARENT TANF AG (C, I)

Work-eligible parents in the family must participate in work activities for a combined average of at least 35 hours per week during the month, and at least 30 of the 35 hours per week come from participation in core activities, if the

family receives federally funded child care assistance and an adult in the family does not have a disability or is not caring for a child with a disability, then the work-eligible individuals must be participating in work activities for an average of at least 55 hours per week to count as a two-parent family engaged in work for the month.

"Core" activities:

Unsubsidized Employment

Subsidized Private and Public Sector Employment

Community Work Experience Program (CWEP)

Community Service

Vocational Educational Training

On-the-Job Training (OJT)

Job Search/Job Readiness: The federal government has mandated a combined limit of six weeks in Job Search and Job Readiness activities for TANF recipients; however, because Indiana has been designated a "needy" state, the Indiana combined limit is currently 12 weeks. Only four weeks of participation in any combination of these activities may be consecutive in a 12 month period.

2510.00.00 APPLICANT SERVICES (C, I)

Effective November 1, 2011, as a condition of eligibility for TANF Cash Assistance, TANF applicants (except those being added to an existing TANF case, or those with an active IMPACT case) deemed IMPACT mandatory during the data gathering process, who would not be excluded members of the TANF AG as defined in *Section 3215.05.15*, are required to:

- Complete Applicant Job Search (AJS) Orientation which includes completing the Applicant Job Search Self-Sufficiency Plan Assessment and Self-Sufficiency Plan and,
- Participate in approved assigned activities for a minimum of twenty (20) days (the 20 days are not required to be consecutive, but missed days do

not count towards compliance) for a minimum of four (4) hours each day within a sixty (60) day application time frame which may include any day(s) Sunday through Saturday. Job Search activities are to be recorded on the Job Search Worksheet, SF 54180 (English) and SF 54458 (Spanish). Job Readiness and Job Search Training activities are to be documented on IMPACT Attendance Record, SF 54682 (English) and SF 54782 (Spanish). All activities may also be recorded via an approved electronic method.)

Approved Activities:

- Job Search (actively seeking employment) for a minimum of sixty (60) hours during the twenty (20) days. Job Search is to be the principle activity for applicants and has priority over Job Readiness activities. Days with less than 4 hours of activity will not count towards compliance. Hours in excess of 4 do not count for more than one day compliance.
- Job Search Training and Job Readiness activities are only to be utilized, if needed, to complement Job Search, and are not to exceed a maximum of twenty (20) hours of the required twenty (20) days. Days with less than 4 hours of activity will not count towards compliance. Hours in excess of 4 do not count for more than one day compliance.
- *Orientation day will count as one of the twenty (20) days of AJS compliance even if it is the only activity scheduled for the day. Hours in excess of 4 do not count for more than one day compliance.
- *Employment obtained while participating in AJS, or obtained prior to beginning AJS, counts towards the daily participation requirement. Any day that a participant is scheduled to work and employment is verified of at least one hour, counts as a compliant day for AJS, even if less than (4) four hours for the day. Hours in excess of 4 do not count for more than one day

compliance. (Self-employment will not count for AJS).

- *English as a Second Language (ESL) is defined as instruction in English for those whose native language is not English. Participants are those who need assistance with speaking, reading, writing, and comprehending the English language. ESL is an allowable AJS activity and any day a participant is scheduled to participate and they do participate at least one hour as verified by school records or training provider records, is a countable AJS day. Hours in excess of 4 do not count for more than one day compliance.
- *The hours that a teen parent/caretaker age 19 and under attends *High School or *High School Equivalency (HSE) classes will satisfy the AJS requirement by satisfactorily attending high school or HSE classes, but verification by school officials of twenty (20) days of attendance is required.

IMPACT supportive services are to be limited to child care and transportation assistance.

Child Care Services: AJS participants will have the same priority as TANF IMPACT participants regarding child care assistance through CCDF; however, applicants are limited to a maximum of six (6) weeks of child care services in which to complete their AJS requirements.

The completed DFR/CCDF REFERRAL Form [SF 53132) is sent from FSSA Outlook E-mail to the Intake Agent's State E-mail address. In instances in which a vendor no longer has a State E-mail address, IMPACT staff must type "\$secure" (replace the S with the dollar symbol) in the subject line of the message to encrypt the message.

Before sending the completed REFERRAL Form, it should be reviewed to ensure:

1. Job Search or Employment activity is checked,
2. Begin and End dates of the activity are specified, and
3. AJS is checked in the Type of Referral

Section.

4. If the AJS box is checked, there will be no TANF IMPACT benefit amount in the field since AJS is prior to TANF authorization.
5. The "General Comments" section should indicate 30 hours of child care on all referrals.

Incomplete referrals will result in the denial of services.

The Intake Agent will treat the e-mailed name of the IMPACT case manager and address as the IMPACT staff's signature. Upon authorization completion, or expiration of a referral, the Intake Agent should complete Section B of the REFERRAL Form and FAX it to the Service Center at 800-403-0864 or local FAX number on the Referral form to be attached to the case.

Failure to comply with AJS requirements by completing AJS Orientation including the AJS Assessment, and a minimum of twenty (20) days in the assigned employment and training activities listed on the applicant's SSP may result in the denial of the TANF application.

- Failure to attend a scheduled Orientation/Assessment Interview and participate in the activities specified on the individual's SSP for a minimum of twenty (20) days within the sixty (60) day period, will result in a Notice of Non-Compliance with TANF IMPACT Applicant Job Search (Employment and Training) Requirements to the applicant. The notice includes instruction on claiming good cause for non-compliance.

Failure to reply to the Notice of Non-Compliance may lead to the denial of the TANF application.

- If the applicant responds and good cause is established in writing, the eligibility determination will continue.
- If good cause is not established, the TANF application will be denied and the individual will need to re-apply for TANF benefits.

Good cause is limited to the following:

- The required actions were beyond the capability

of the participant to perform, or the circumstances were beyond the individual's ability to control. A supervisory determination is required to grant a good cause exemption from AJS, and allow TANF to be authorized.

- TANF applicants residing in domestic violence shelters are to be granted good cause from participating in AJS.

2515.00.00 CASE MANAGEMENT (S, C, I)

Case management is the process of coordinating and brokering the multiple services needed by participants to achieve economic self-sufficiency. Successful case management is the result of policy and program support from Central Office, competent IMPACT staff, and the utilization of community resources.

IMPACT case managers (CM) serve as both the point of contact for IMPACT participants and the point of accountability for program administrators. They may refer individuals to other community service agencies to meet their particular needs and should encourage them to strive toward self-sufficiency.

IMPACT case managers are expected to make **at least** monthly contacts with participants.

The case management process is designed to provide a structured and standardized approach to the delivery of services that will achieve specific objectives and perform the following functions:

- Individual Self-Sufficiency Plan Assessment;
- Development of the Self-Sufficiency Plan (SSP) with the participant that will include both short and long-term goals for attaining self-sufficiency;
- Communicate the options and opportunities the IMPACT program offers;
- Provide referrals to appropriate community

resources or services;

- Monitor participation hours;
- Provide supportive services;
- Evaluate outcomes, and
- Maintain confidentiality.

Throughout the case management process, attention must focus on the strengths and limitations of the participant and the individual's ability to successfully achieve these short and long-term goals. Establishing these goals may be more difficult when substance abuse, mental health and/or domestic violence issues are present which may require more intensive monitoring of the individual's progress and/or frequent updating of the SSP.

Case management is required for SNAP IMPACT and services will be provided to all E&T participants.

Case management and all IMPACT activities end when the SNAP Assistance Group (AG) closes. No further SNAP E&T funds, including supportive services and contracted IMPACT activities, are permitted to be used. The only exception is if the AG was receiving SNAP in the month of or the month prior to when job retention services begin.

2520.00.00 INITIAL IMPACT APPOINTMENT (S, C, I)

The initial appointment with IMPACT for any program must include a thorough orientation regarding the rules, rights, and responsibilities associated with the program.

The client must be actively involved in the creation of the self-sufficiency plan, and must leave the appointment with complete knowledge and understanding of the expectations and requirements of IMPACT participation. The client must understand how participation in IMPACT can affect eligibility for DFR benefits. The client must have a thorough understanding of the services available as an IMPACT participant and how to obtain those services.

An authorized rep (AR) cannot complete an orientation, other appointments, or participate for a client referred to IMPACT. An authorized rep can assist the participant in

understanding their responsibilities, but cannot complete any IMPACT responsibilities for the client. The client is solely responsible to complete all IMPACT requirements and sign all documents accordingly.

2520.05.00 TANF IMPACT Case Manager Responsibilities (C, I)

During the initial IMPACT appointment, the IMPACT case manager (CM) must explain to the payee/caretaker relative of the Assistance Group (AG), or the individual required to participate, both orally and in writing, the following information:

- The participation requirements;
- Each allowable exemption;
- The right to a fair hearing to contest the decision requiring the individual to participate;
- The right to a fair hearing for a **TANF** AG member's refusal to comply with IMPACT requirements which would result in a Full Family Sanction;
- The requirement that changes which would affect IMPACT status (for example, child age 16 or 17 no longer in school, or recovery from illness or incapacity) be reported to the IMPACT Office within 10 days of the change, and
- The penalties for refusing to participate.

The payee of the AG is responsible for sharing this information with all other AG members required to participate. Any AG member may contact the IMPACT case manager for clarification of the information.

2525.00.00 IMPACT ASSESSMENT PROCESS (S, C, I)

The purpose of the four-page IMPACT Self-Sufficiency Plan Assessment (SF 54191/English and SF 54465/Spanish) is to identify the following through an interactive process between the client and the IMPACT case manager:

Individual and family strengths upon which to build;

Barriers to employment and/or self-sufficiency;

Supportive services necessary to help the participant comply with IMPACT Program requirements, and/or

The need for other services available within the community.

2525.05.00 ASSESSMENT TIME FRAMES (S, C, I)

TANF IMPACT mandatory recipients are automatically referred to the IMPACT Program and will have the four-page IMPACT Self-Sufficiency Plan Assessment (SF 54191/English and SF 54456/Spanish) and Self-Sufficiency Plan (SSP) (SF 47194/English and SF 53403/Spanish) completed during the appointment. The opportunity to complete the appointment should occur within 10 days of the referral.

Effective July 1, 2015, SNAP ABAWDs (Able-Bodied Adults Without Dependents) between the ages of 18 and 49 are automatically referred to IMPACT upon their initial approval for SNAP. All ABAWDs are subject to time limited benefits. The IMPACT Self-Sufficiency Plan Assessment (SF 54191/English and SF 54456/Spanish) and the Self-Sufficiency Plan (SSP) (SF 47194/English and SF 53403/Spanish) should be completed at the initial IMPACT Orientation session. Failure to keep their Orientation appointment will result in a Notice of Missed Appointment - ABAWD.

SNAP recipients* who volunteer for IMPACT are automatically referred to the IMPACT Program when the eligibility worker changes their referral code from 00 to 25 in the Eligibility System. The IMPACT Self-Sufficiency Plan Assessment and Self-Sufficiency Plan should be completed at the initial IMPACT Orientation session.

SNAP recipients, other than ABAWDs, who are exempt from Work Registration or otherwise exempt. (See *Section 2438.17.05* for ABAWD Status Determination.)

*Assessments should be updated as needed based on the participant's circumstances and case changes, at a minimum of every six (6) months.

2525.10.00 ASSESSING STRENGTHS AND BARRIERS TO SELF-SUFFICIENCY (S, C, I)

A comprehensive evaluation of an individual's needs and barriers is completed prior to beginning IMPACT activities. The participant must be actively involved in the completion of the assessment and in creating the self-sufficiency plan, including assisting in identifying strengths, interests and goals.

Details about IMPACT rights, responsibilities, activities and supportive services are also included as part of the assessment process.

The SNAP IMPACT Reporting Requirements Notification (SF 56673) is to be signed by all SNAP participants to acknowledge receipt of this notification. The form will also be signed by IMPACT staff.

*Assessments should be updated as needed based on the participant's circumstances and case changes, at a minimum of every six (6) months.

The following areas should be addressed, as appropriate:

Work Experience: Listing of all jobs with details including dates of employment, duration and reason for leaving.

Education and Training: Current levels of education completed. Training details including type of training, dates of training, and credentials received.

Job Skills: Skills/experience obtained via employment, training, hobbies, etc.

Career/Occupational Interests: What type of employment, details about the kind of work desired, shift availability, travel distance, limitations on work, etc.

Military Service: Branch, period of active duty, rank at discharge and duties.

Personal and Family Health: Discuss the physical and mental health status of the participant and the individual's immediate family members and how they may affect the participant's employment. If caring for an incapacitated person, the relationship and time required.

Transportation Resources: What type of transportation is accessible and used, and if transportation assistance is needed.

Child Care Needs: Determine the need for reliable child care and the presence of any special needs that must be addressed in the development of the child care plan.

Support Network: Identify those persons who provide emotional, social, or other support to the individual and family.

Other Barriers to Participation: Legal problems, criminal background, health issues, lack of appropriate clothing, housing concerns, and lack of recent work history.

ABAWD Screening for Fitness for Work: Any SNAP ABAWD participant that states or indicates on the IMPACT Assessment (SF 54191) that a physical or mental disability or condition exists and it's a barrier to obtaining or maintaining employment, then the Statement of Medical Condition (SF 54717) is to be provided. IMPACT staff will then refer the participant to State eligibility staff for further screening and case action if the fitness for work issue is observable. Participants are to be directed to speak to appropriate State eligibility staff if in the office or via the phone at 800-403-0864. IMPACT staff will also send an email to the appropriate DFR mailbox to ensure that State staff follow-up. IMPACT staff will also record the participant's statements as well as the State's response in the case notes. The participant may submit a written request that a signed Statement of Medical Condition (SF 54717) form be sent to the medical provider by staff. However, DFR and IMPACT staff must not contact medical providers directly.

Upon completion of the Self-Sufficiency Plan Assessment, an individualized Self-Sufficiency Plan (SSP) is developed with the participant.

2530.00.00 SELF-SUFFICIENCY PLANS (S, C, I)

Upon referral to IMPACT, the Orientation appointment shall occur within 30 days for TANF and SNAP participants, at which point the Self-Sufficiency Plan (SSP) will be completed jointly by the case manager and participant utilizing the Self-Sufficiency Plan Assessment. The SSP is an agreement signed by the participant and the IMPACT case manager.

Participation in allowable work activities must begin as soon as possible for TANF mandatory IMPACT participants and ABAWDs. For SNAP volunteers, participation should begin within two (2) weeks from the completion of their IMPACT Orientation unless there are other barriers to participation that need to be addressed. (See *Section 2540.00.00* for IMPACT activities.)

2530.05.05 Self-Sufficiency Plan Development and Contents (S, C, I)

The Self-Sufficiency Plan (SSP) should set an employment goal and plan for moving immediately into private-sector employment. The obligations of the individual should be described which could include going to school, maintaining certain grades, keeping school-aged children in school, immunizing children, going to classes or doing other things that will help the individual become or remain employed.

The plan should be designed to move the individual into appropriate employment the individual is capable of handling as quickly as possible and to increase the responsibility over time and the amount of work. The plan should describe services the State will provide the individual to assist in obtaining employment including job counseling services.

The IMPACT CM should schedule participation in appropriate IMPACT work activities as follows:

TANF IMPACT mandatory recipients should be scheduled for a sufficient number of hours (usually 30 per week) to meet the participation requirements in *Section 2505.05.00*.

ABAWDs are to be scheduled for 20 hours per week in allowable work activities, except CWEP. (See *Section 2540.10.15* for Supervised Job Search limits and *2540.10.30* for CWEP requirements.)

SNAP IMPACT volunteers should be scheduled an appropriate number of hours per week in allowable work activities to enable them to achieve self-sufficiency. Independent job search is not considered a valid job search activity.

NOTE: Individuals in treatment for domestic violence, substance abuse, or mental health problems may find it difficult to participate all the hours necessary to meet IMPACT requirements. Therefore, following consultation with the participant's treatment professional and the IMPACT supervisor, the Case Manager may approve reduced participation hours, if appropriate. This must be documented in the System of Record.

In addition, there may be instances in which an individual will require up to 90 days, or more, of good cause time due to a verified medical condition before beginning or resuming IMPACT activities. The **SF 54717 - STATEMENT OF MEDICAL CONDITION FOR DETERMINATION OF PARTICIPATION IN THE IMPACT PROGRAM**, or other approved medical verification, is required to complete the Good Cause SSP. The Good Cause SSP only applies to TANF. Good cause is not allowable for SNAP participants. Follow-up meetings with the IMPACT case manager to re-assess the individual's condition will be every three (3) months, at a minimum.

The Self-Sufficiency Plan must be developed based on the results of a comprehensive assessment of the individual's workforce-related strengths and weaknesses. The assessment is to be reviewed thoroughly with the participant prior to completing the SSP to ensure the form is completed fully and accurately.

The highly individualized plan is an ongoing strategy to identify employment goals, achievement objectives, and an appropriate combination of services for the participant to achieve identified goals. It should include begin and anticipated end/review dates of IMPACT activities, including number of hours scheduled and strategies to overcome barriers.

SSPs are to be detailed including being: "Specific, Measurable, Attainable, Results-oriented, and Time-limited" (SMART) and should contain:

1. A clearly defined and realistic employment goal stating that the participant is expected to seek, accept, and maintain full-time employment at minimum wage or greater.
2. The strengths and barriers identified during the Assessment process.
3. Clearly defined activities necessary to achieve the primary goal of economic self-sufficiency for the family.
 - Activities are the only entries to be listed under the 'IMPACT Activity' column of the SSP.
4. Actions or steps details that will help the individual follow through and/or fulfill the requirements of the activities. The activities must:
 - Address all barriers identified in the assessment process through IMPACT services and/or referrals to other community resources, and
5. Anticipated outcome details including all aspects of the expectations and desired results.
6. Realistic time frames for completing each activity by specifying a realistic "Assignment Date," a "Projected Completion Date," and "Weekly Participation Hours" that is anticipated will be needed to achieve self-sufficiency. (*Note: Participation hours are entered daily for AJS and weekly for TANF and SNAP.*)

7. TANF 24-month clock: A reminder of the time remaining for those individuals who are, or will be, subject to the 24-month limit to cash benefits. (NOTE: Completion of the 12 month lifetime limit for Vocational Educational Training is no longer tied to the 24-month clock.)
8. ABAWD 3-month clock: A reminder of the time remaining for those individuals who are subject to the 3-month limit for ABAWDs. This should be included as part of the 'actions or steps details' of the IMPACT activity that will help the participant fulfill the work requirement.
9. Signature of the participant and IMPACT case manager. The IMPACT case manager (CM) should discuss the supportive services available to help the participant comply with the IMPACT Program requirements, if the individual has no other resources.

Effective 10/01/08, TANF individuals in the process of completing their 12 month lifetime limit in Vocational Educational Training are to be assigned to an appropriate IMPACT activity for the hours remaining of their 20 or 30 per week requirement after their course credits and required hours for unsupervised study have been determined.

For example, four (4) three (3) credit courses per week would count for 12 weekly participation hours and the advised or required hours for unsupervised study time *could* count for an additional 12 hours of participation for a total of 24 weekly hours. If the required weekly participation hours are 30, the client would need to participate an additional six (6) hours to meet the 30 hour requirement. If the weekly participation requirement is 20 hours, the client would be compliant when participating in Vocational Educational Training only.

2530.05.15 Signing the Self-Sufficiency Plan (S, C, I)

Participants should understand that by signing the Self-Sufficiency Plan (SSP), they are agreeing to perform the activities listed therein. Before leaving the interview, the individual should be given a signed copy of the SSP and Rights and Responsibilities.

TANF mandatory participants who fail to comply with IMPACT requirements are subject to a sanction and loss of their

TANF benefits and supportive services. (See *Section 2545.15.05* for Two-Parent TANF and Regular TANF Sanction Periods.)

Effective July 1, 2015, ABAWDs who have exhausted their countable three (3) months of benefits and do not comply with ABAWD work requirements will lose their benefits for the remainder of the 36-month period. The first three (3) months do not have to be consecutive. (See *Section 2438.17.15* for Regaining Eligibility during the 36-month time period.)

SNAP IMPACT volunteers may be removed from the IMPACT program for non-compliance with their IMPACT requirements without loss of benefits, or the imposition of a sanction.

2540.00.00 IMPACT ACTIVITIES (S, C, I)

IMPACT activities are the employment, training, and educational activities to which participants are assigned following the initial assessment process to help them achieve economic self-sufficiency. These activities should reflect the needs of the family and focus on removing barriers to employment identified in the Self-sufficiency Plan Assessment. Their purpose is to increase household income by assisting the participant in obtaining full time employment. These activities may be furnished by community service agencies, the Department of Workforce Development (DWD), educational institutions, and the local IMPACT Office.

Activities may differ for TANF recipients, SNAP volunteers, and ABAWDs as explained below.

2540.05.00 REPORTING IMPACT HOURS (C, I)

Scheduled weekly hours are recorded in the System of Record (SOR) for TANF IMPACT participants. Effective August 2018, actual weekly hours of participation in the activity and excused absences are to be recorded in the SOR by the 10th of each month. If a recipient fails to complete the assigned number of weekly or monthly hours for each activity listed on the Self-Sufficiency Plan (SSP) in the time frame agreed upon, the System will generate a Notice of Non-Compliance with IMPACT Requirements. Because the TANF Work Participation Rate (WPR) is calculated in part from the information displayed in the SOR, accuracy in reporting participation in all activities is required.

Counting participation hours: The following criteria clarify the types of participation hours which can be counted.

- 1. Stacking activities:** IMPACT case managers may stack more than one activity such as CWEP and Educational (Academic) Training. When activities are stacked, the hours spent in each activity are to be reported separately. (NOTE: CWEP can be stacked with part-time but not full-time employment.)

When CWEP hours are stacked with another activity, the number of CWEP hours included in the weekly participation requirement may not be less than the hours determined by the CWEP formula, unless that number exceeds the weekly "core" requirement. (See *Section 2540.10.30.10* for the formula for determining the CWEP participation requirement.)

- 2. Homework time (secondary and post-secondary educational activities such as instructional certificate programs and industry skill certification):** Reporting "hours only" may be an appropriate method for reporting time spent on-site in supervised activities such as short term skills training and certification programs for which no course credits are assigned (Certified Nursing Assistant, High School Equivalency (HSE) classes, medical technology, etc.). The IMPACT case manager should state under "Comments" on the Attendance Form why "hours only" are being reported instead of course credits and unsupervised study hours. However, if required, one hour of unsupervised homework for each hour of class is countable (except for clients attending high school).

When course credits are assigned to short term skills training and certification programs, participation should be reported as course credits plus weekly homework hours.

To receive credit for participation in Vocational Educational Training, Educational (Academic) Training, or Job Skills Training, both the

instructor and participant must verify attendance by signing and dating the weekly attendance report for each class. The total number of weekly homework hours required or advised *in writing* by the instructor or supervisor in each subject area may not exceed the scheduled weekly course credits or, if appropriate, class hours.

Vocational Educational Training and Educational (Academic) Training participation hours may not exceed the predetermined number of scheduled weekly hours reflected in the SOR. Hours may not carry over from one week to another to make up for missed hours. Also, the actual weekly participation hours recorded in the SOR may be *less* than, but *not more* than, the weekly scheduled hours.

- 3. Unsupervised study time (post-secondary associate, bachelor and advanced degree programs):** The institution must verify the number of credits per course in which the client is enrolled. In addition, the institution or instructor must verify *in writing* the required or advised number of weekly unsupervised study hours *not to exceed one hour of participation per course credit*. For participation in Vocational Educational Training to be countable, each instructor and participant must document attendance by signing and dating the weekly attendance report for each class.

When the institution documents the number of weekly "credits" per course in which the client is enrolled, the total credits, plus any allowable unsupervised study hours as verified by the instructor(s) are to be recorded as "scheduled hours" in the System of Record, *not the hours actually spent in class*.

NOTE: While the above is the preferred method for reporting participation in post-secondary and college level educational activities, there may be instances in which reporting **only** the *hours spent in class and on-site* may be more representative of the client's participation.

For example, some post-secondary institutions offer accelerated programs. Clients may enroll in one or two courses that are offered for 4 or 5 weeks and require on-site attendance for 4 or 5 hours a day for several days each week. In such cases, the IMPACT case manager should consider whether participation is best represented by reporting only verified in-class/on-site "hours" instead of credits and up to an equal number of verified weekly homework hours. When in-class "hours only" are reported, the IMPACT case manager is to clearly state the reason under "Comments" on the Attendance Form. (Not applicable to Distance Learning/Internet courses.)

Holidays: When regularly scheduled unpaid work activities fall on one of the holidays listed below, and prevent the individual from participating in an assigned activity, the individual is deemed to have participated for the assigned hours that would have been completed were it not for the holiday:

| | |
|-----------------------------|---------------------------|
| New Year's Day | Labor Day |
| Martin Luther King, Jr. Day | Thanksgiving Day |
| Good Friday | Friday after Thanksgiving |
| Memorial Day | Christmas Eve Day |
| Independence Day | Christmas Day |

NOTE: Participants may receive credit for either holiday hours not to exceed the scheduled number of daily hours, or actual hours of participation, but not both.

With the exception of clients age 19 and under attending high school or HSE classes, clients engaged in educational activities must participate in the assigned number of weekly hours in a countable activity during semester breaks, spring or fall break, and Christmas break. During summer break, clients must complete the scheduled number of weekly hours in a countable work activity even if they plan to return to school the following academic year. All countable participation hours are to be recorded in the SOR.

Absences: Participants are allowed 16 hours per month for excused absences and, if needed, a maximum of 80 hours in a rolling 12 month period to complete the required number of monthly participation hours.

The number of hours reported by a participant is not to include time spent commuting to or from an assignment, or to and from a child care provider.

2540.10.00 TANF AND SNAP IMPACT ACTIVITIES (S, C, I)

Except for employment, *scheduled* hours of weekly participation in other IMPACT activities are reflected in the System of Record (SOR). The number of weekly hours of participation actually *completed* in these activities is to be recorded in the SOR).

TANF IMPACT "core" activities are:

Unsubsidized Private and Public Sector Employment

Subsidized Private and Public Sector Employment

Job Search and Job Readiness

Community Work Experience Program (CWEP)

Community Service Programs

Vocational Educational Training

Educational (Academic) Activities*

On-the-Job Training (OJT)

FSSA funded Job Skills Training

*High School (HS) attendance and High School Equivalency (HSE) classes are *core* activities for TANF recipients age 19 and under who are heads of household, but are *non-core* activities for TANF recipients age 20 and older.

SNAP IMPACT volunteers are to be scheduled to participate in an appropriate number of hours per week, based on their skills, interests, and education. Activity/component hours are determined by the case manager in conjunction with the participant with no maximum limit which excludes CWEP. Volunteers should not be scheduled for less than 12 hours a month in an activity/component except CWEP.

Case managers must assist participants with comprehensive services and are to stack activities when possible. Job

Readiness, consisting of employability assessments; job finding clubs; employment leads; job seeking techniques; access to computers; local job market information; job placement services; referrals to local resources; or other direct training or support activities, should be provided before or with Job Search.

Job Search/Readiness should be reviewed after 30 days to determine if the participant should be placed in in other IMPACT activities.

*Independent job search is not an appropriate activity for SNAP IMPACT volunteers since all job search must be supervised.

Volunteers that obtain employment while participating in IMPACT are eligible for supportive services to assist in maintaining the employment while participating in IMPACT. Volunteers that successfully complete an FSSA training and obtain employment as a result are eligible to receive supportive services to maintain the employment while participating in IMPACT.

Volunteers should be scheduled in one or more of the following IMPACT work and non-work **components/activities****:

Job Search (as defined above)

Job Readiness

Community Work Experience - CWEP/Workfare
(participation hours are based on the number determined by the CWEP formula and may be less than 20)

Work Experience - WE - (participation hours are based on the number determined by the CWEP formula and may be less than 20)

Job Skills Evaluation and Job Skills Training

FSSA funded Job Skills Training

Vocational Training

Self-Initiated Vocational Training

Educational (Academic) Activities

ABAWD IMPACT activities: ABAWDs can fulfill the work requirement by participating at least 20 hours per week in one or more of the following IMPACT work and non-work **components/activities*:**

Job Search (See *Section 2540.10.15*)

Job Readiness (See *Section 2540.10.15*)

Community Work Experience - CWEP/Workfare
(participation hours are based on the number determined by the CWEP formula and may be less than 20)

Work Experience - WE - (participation hours are based on the number determined by the CWEP formula and may be less than 20, difference must be completed in another activity or work)

Job Skills Evaluation and Job Skills Training

FSSA funded Job Skills Training

Vocational Training

Self-Initiated Vocational Training

Educational (Academic) Activities

Working a minimum of 20 hours per week, *averaged monthly***

*Unsubsidized employment (including self-employment in-kind employment, and unpaid work) and subsidized employment are work requirements for ABAWDs.

***Averaged monthly* is only applicable to work and means that the individual's weekly employment hours must *average* at least 80 hours per month.

ABAWDs can meet the work requirement by working an average of 20 hours per week, participating in an approved SNAP IMPACT activity(ies) for 20 hours per week, or with any combination of work and participation in an approved IMPACT activity for 20 hours per week, or by participating in a CWEP the required number of hours. (See *Section 2438.17.00.*)

IMPACT activities/components and their requirements are described below for TANF and SNAP participants, and ABAWDs.

2540.10.05 Unsubsidized Employment (C, I)

Unsubsidized Employment (including Self-Employment) is defined as any activity involving effort on the part of the participant for which wages, salaries, commissions, or profits are paid and this payment is not subsidized by the State or Federal programs such as IMPACT, Workforce Investment Act (WIA) and Vocational Rehabilitation, or would be paid if the participant had not chosen the option to receive goods for services for the performed activity (in-kind earnings).

Counting unsubsidized employment hours/income: The number of actual participation hours is verified through hard copy/written documentation from the employer such as pay stubs or other employer produced information substantiating the number of hours worked. Hours may be projected for six months based on one full pay period that is representative of continuing circumstances.

Unsubsidized employment income: should be recorded in the Eligibility System.

Counting self-employment income: Self-employed individuals must verify gross earned income and expenses. Countable monthly hours are based on gross income minus 40 percent for expenses or actual expenses, **whichever is greater**, divided by the federal minimum wage. Monthly hours are divided by 4.33 to find the countable weekly participation hours. Self-employment income is recorded in the Eligibility System.

Self-employed individuals must provide documentation from the individual or agency for whom the service was performed describing the kind or type of service provided, number of hours required to complete the service, place service occurred, and the dollar amount (income) paid for the service. If the individual wishes to deduct actual expenses from his/her income in lieu of a 40% standard deduction, the actual expenses must be documented. Self-employment activities are to be noted in the individual's case file and in the Eligibility System. All documentation is to be retained.

2540.10.10 Subsidized Private and Public Sector

Employment (C, I)

Subsidized Private or Public Sector Employment includes paid employment for which an employer receives a subsidy from TANF or other public funds to offset the cost of some or all of the wages and costs of employing a participant.

Counting employment hours: Hours worked are verified and recorded in the same way as "unsubsidized employment" described above.

2540.10.15 Job Search (S, C, I)

Job Search activities are designed to assist a recipient to immediately apply for and find employment leading to economic self-sufficiency. It is particularly suitable for a participant who has recent work experience, or a satisfactory work history, who may be able to re-enter the work force with minimal time or assistance from the IMPACT Office. SNAP individuals participating in job search must be directly supervised at State approved locations.

Job Search and Job Readiness activities include how to:

- (a) Search for job openings,
- (b) Complete employment applications,
- (c) Interview for positions, including follow-up contacts, and
- (d) Write thank you notes to potential employers.

"Actual time" utilized is credited for each internet and "in-person" employer contact. The number of hours reported by the recipient is not to include travel time to the first or from the last "in-person" employer contact.

TANF recipients who submit electronic (Internet) applications for employment must print the application, or the receipt issued by the potential employer verifying that the application was received, *before it is e-mailed or submitted*, and document the potential employer on the JOB SEARCH WORKSHEET (SF 54180) just like any other "in person" contact. In order for the IMPACT case manager to calculate the hourly credit, documentation must include the "start" and "end" times of each Job Search activity.

The JOB SEARCH WORKSHEET verifying contacts must be submitted to the IMPACT Office at least weekly unless

stated otherwise on the Self-Sufficiency Plan.

Counting participation hours: For **TANF IMPACT participants**, after a combined total of twelve (12) weeks of Job Search and Job Readiness activities have been completed in a rolling 12 month period (of which only four (4) may be consecutive), Job Search and Job Readiness activities will NOT count toward the work participation rate. Also, a single reported hour of Job Search will count for one (1) week of Job Search activities in both the four (4) consecutive weeks and the remaining eight (8) weeks of the rolling 12 month period. Participants may continue in this activity along with other activities such as CWEP to enhance their employability if self-sufficiency through employment has not been obtained even though the activity hours will not be counted when calculating the TANF work participation rate (WPR).

For **SNAP ABAWDs**, Supervised Job Search and Job Readiness are not qualifying activities. However, when offered in combination with other IMPACT activities, Supervised Job Search/Job Readiness is acceptable as long as it comprises less than half (10 hours) of the 20-hour requirement. If appropriate, ABAWDs may also participate for a total of eight (8) weeks in Supervised Job Search in any 12 consecutive months as long as the activity counts for <50% of the total weekly required hours.

In addition, up to thirty (30) consecutive calendar days of Supervised Job Search including Job Readiness coded as CWEP is allowable, but not required, as part of the CWEP assignment following the *initial certification period only*, and *prior* to placement at a CWEP work site. Participants are considered to be participating in, and complying with IMPACT requirements during this Supervised Job Search period and fulfilling the ABAWD work requirement if they are meeting their household's calculated CWEP participation hours.

2540.10.20 Job Readiness (S, C, I)

Job Readiness provides employment preparation for **TANF, SNAP and ABAWD IMPACT** participants who are considered to be "work ready" based upon their skills, Assessment, and work history. Activities include, but are not limited to:

- Practice in completing job applications,
- Resume development, and

Interviewing techniques.

The goal is to connect the participant with employment of at least 20 hours per week at minimum wage or higher.

2540.10.25 Job Readiness Activities (S, C, I)

Job Readiness activities (in addition to those listed above) are designed to prepare IMPACT participants for employment by familiarizing them with general work place expectations, behavior, and attitudes necessary to compete successfully in the labor market. Job Readiness activities are provided through workshops in:

Family Life Skills that include topics such as parenting, budgeting, personal hygiene, stress management, problem solving and coping strategies, and family management changes that may be needed due to employment.

Job Retention and Job Coping Skills including problem solving exercises based on employer expectations and situations a new employee might face, work place communication skills, understanding and improving personal responsibility, and relationship building.

Training specific to obtaining and maintaining employment such as resume writing, completing job applications, and learning interviewing skills including how to make follow-up contacts and write thank you notes to potential employers, and

Substance Abuse and Mental Health Treatment or Rehabilitation Services (not applicable to SNAP only recipients) to remove drug and alcohol dependency or mental health barriers that impact the client's ability to obtain and retain employment will be considered Job Search and Job Readiness activities if deemed necessary by a qualified medical or mental health professional. Medicaid may be accessed to cover these services. If a participant is not eligible for Medicaid, other sources of medical assistance should be explored with the IMPACT case manager.

NOTE: The total hours an ABAWD may participate in an employment and training activity together with any hours worked for compensation in cash or in-kind (including CWEP)

cannot exceed 120 hours per month. However, participants may volunteer for additional hours of training.

2540.10.25.05 Job Placement (S, I)

Job Placement activities include assisting volunteer **SNAP** participants and **ABAWDs** find employment of at least 20 hours per week at federal minimum wage or greater. Participants are required to:

- Complete applications for employment,
- Attend job interviews,
- Initiate post interview employer contacts, and
- Accept any credible or suitable offer of employment.

2540.10.30 IMPACT Community Work Experience Program - CWEP (S, C, I)

The **Community Work Experience Program (CWEP)** work activity provides a participant an opportunity to acquire general skills, knowledge, and work habits necessary to obtain employment. The purpose of CWEP is to improve the employability of those who cannot find unsubsidized full-time employment. CWEP is intended to be a short term preparation for employment.

Effective August 1, 2018, CWEP assignments are limited to six (6) months per client in a thirty six (36) month period, subject to approval. Generally, CWEP placements are for ninety (90) days at a time. If additional months of CWEP placement are being considered, they must be approved by state policy in advance of any additional months being assigned.

TANF participants can perform work at private sector employment sites or for the direct benefit of the community under the supervision of public or nonprofit organizations or for-profit site. CWEP sites that serve a useful community purpose in fields such as health, social service, environmental protection, education, recreation, public facilities, and public safety are encouraged. This activity must be supervised by an employer, work site supervisor, or other responsible party on a daily basis.

SNAP volunteers and ABAWDs can perform work in a public

service capacity. The primary goal of CWEP is to improve employability and encourage individuals to move into regular employment. Sites are limited to public and private non-profit employers.

Participants are placed in an unpaid position that is closely related to their employment goals and interests. CWEP activities are designed to help participants:

- Gain work experience while fulfilling activity program hours;
- Attain and improve key work skills and attitudes needed for transitioning into the work place;
- Benefit from positive role models;
- Increase self-esteem, and
- Enhance their resume.

Participating in CWEP for the appropriate number of hours fulfills the work requirement for ABAWDs. However, ABAWDs and SNAP volunteers may combine CWEP with other IMPACT activities such as Educational (Academic) Training to improve their skills and increase their employment options, or Supervised Job Search.

ABAWDs may participate in up to thirty (30) consecutive days of Supervised Job Search as part of their CWEP assignment following their initial SNAP certification, but not at re-certification. Hours are based on the CWEP formula.

The CWEP site employer receives the services of an additional worker at no cost; and may hire the participant as a trained employee.

The IMPACT Office staff defines the CWEP requirements for each IMPACT participant and informs the work site supervisor of the maximum number of hours each participant is to participate and the expected length of the placement.

Designated IMPACT staff establish Community Work Experience Program sites. Staff will visit potential sites to assess work environments, explain the referral process, relate

participant expectations, and site management responsibilities.

Community Work Experience Program (CWEP) and Work Experience (WE) Job Request (SF-46518) forms must be completed before a site is active. The site will remain active until IMPACT staff or site management ends the agreement. The CWEP site manager also agrees the site will:

- Provide a sanitary and non-hazardous work environment that will ensure the health and safety of participants. The same health and safety standards established under state and federal laws for employees shall also apply to CWEP participants;
- Not place a CWEP participant in assignments that replace or prevent the employment of regular employees. Assignments must provide the same benefits and working conditions provided to regular employees performing comparable work for comparable hours. If it is a union position, all union rules and contractual agreements must be followed.
- Not involve CWEP participants in any unethical, political or religious activities;
- Provide CWEP participants with adequate supervision and training necessary for performing the job duties.
- Provide a description of duties the participant will be expected to perform, including the frequency of the activities.
- Complete IMPACT attendance and evaluation forms, and provide them at least monthly to the local IMPACT office.

2540.10.30.10 Determining CWEP Participation Hours (S, C, I)

For TANF recipients: Child support collected by Indiana is included in determining the maximum number of participation hours. The formula below must be used to calculate the maximum number of monthly participation hours:

1. Determine the amount of child support received by IV-D in the prior month even if the family was

not on TANF in that month.

- (a) Do not include arrearage and/or excess child support payments and collections recorded in the Eligibility System in the calculation.
 - (b) Do not include current child support payments received by the family which were used to calculate the AG's TANF grant when determining the amount of the prior month's child support. (Check the Eligibility System for current child support collections.)
2. Subtract this prior month's amount of child support collections from the AG's current TANF grant.
 3. Add this amount to the AG's monthly SNAP allotment,* and
 4. Divide the result by the federal minimum wage to obtain the monthly participation requirement.

*NOTE: When an ineligible TANF individual (such as an SSI or SSDI recipient) is included in the SNAP AG, the SNAP benefits must be pro-rated to exclude both the individual and his/her SNAP benefits before adding the (new) monthly SNAP allotment to the CWEP calculation.

5. To obtain the "weekly" hours of participation, divide the monthly amount by five (5) and round down to the nearest whole number.

TANF recipients may not volunteer for additional CWEP hours and should not be scheduled to participate in a CWEP activity for more than the number of hours determined by the above formula. Also, reduced CWEP hours can fulfill participation requirements. For example:

1. If a TANF AG with a child under six is required to participate an average of 20 hours per week and the CWEP formula exceeds 20 hours, the participant will be in compliance when participating for a weekly average of 20 hours.

2. If a single parent AG is required to participate 30 hours per week and the CWEP formula exceeds 30 hours, the participant will be in compliance when participating for a weekly average of 30 hours.
3. These same rules apply to the Two-Parent TANF AGs. If the CWEP formula exceeds the 30 core hours weekly requirement for a mandatory one-parent AG, or 50 core hours for a mandatory two-parent AG, the individuals will be in compliance when meeting their average weekly participation requirement.

When both parents in a Two-Parent TANF AG are required to participate, the hours determined by the formula described above are to be allocated among those AG members. Because employment takes precedence over other work activities, if one parent in a Two-Parent TANF AG is employed, the CWEP hours are assigned to the other parent.

Deeming CWEP hours: When the CWEP formula results in less than the required 20, 30, or 50 hours, the weekly "core" activity requirement is considered to have been met using the hours from the CWEP formula (rounded down). The hours remaining up to the core weekly requirement are then deemed with the following exceptions:

1. If a single parent AG is required to participate 30 hours per week and the CWEP formula results in less than 20 hours, the hours remaining up to the 20 mandated core hours are deemed. The remaining 10 hours must be assigned to another core or non-core activity.
2. If the CWEP formula results in more than the 20 mandated core hours, but less than the required 30 hours, the individual is to be scheduled for the total number of CWEP hours. The remaining hours needed to achieve an average of 30 hours per week must be assigned in another core or non-core activity.

NOTE: When a CWEP placement is stacked with another activity, the CWEP hours take precedence over the weekly hourly requirement of the other activity.

However, unsubsidized employment will have priority over participation in any other work related activity.

For **SNAP only Assistance Groups (AGs)**, monthly participation hours in voluntary Community Work Experience (CWEPE) are based on the household's monthly SNAP allotment divided by the federal minimum wage rounded down to the nearest whole number. For example: Allotment (\$192)/minimum wage (\$7.25) = 26.48 (rounded to 26 hours of CWEPE per month).

To obtain the weekly hours of participation, divide the monthly hours by the number of weeks in a month determined by the number of Wednesdays in the month, rounded to the nearest quarter of an hour.

CWEPE is a household responsibility, based on the AG's SNAP allotment. In households with more than one ABAWD, monthly work hours can be completed by one member or shared between members. If the household's CWEPE hours are completed by one or more members, the work requirement is fulfilled for all members of the AG. If partial household hours are completed in a month, all ABAWDs would fail to fulfill the work requirement for the month.

The total hours of participation in an IMPACT component for any household member individually in a month, together with CWEPE activities and time worked (paid or unpaid), must not exceed 120.

SNAP volunteers and ABAWDs may not volunteer for additional CWEPE hours and should not be scheduled to participate in a CWEPE activity for less than, or more than, the hours determined by this formula.

A participant may receive supportive services such as transportation or child care, if needed, in order to participate in the activity when no other resources are available. (Refer to *Section 2550.00.00.*)

Counting CWEPE participation hours: Actual hours of participation in each activity must be recorded daily on SF 44720 - RECORD OF IMPACT ATTENDANCE. Documentation of client participation and performance evaluations must be submitted to the IMPACT case manager weekly, or by the due date indicated on the Self-Sufficiency Plan (SSP), and at the completion of each CWEPE assignment.

Supervision must be provided daily by the CWEPE employer. The supervisor, or the supervisor's designee, is to provide work-related guidance and mentoring, daily oversight of

work assignments, and evaluation of work skills as part of the formal Agreement between the IMPACT Program and the employer. The supervisor is to meet regularly with the participant to discuss the participant's work.

The participant's SSP must be reviewed no later than three (3) months at the work site. IMPACT staff will determine if the employer intends to hire the participant within three (3) months. If not, the participant will be placed at another work experience site or in another activity.

2540.10.35 Work Experience Program - WE (S, I)

Work Experience is a work component similar to CWEP which is designed to improve the employability of participants through actual work experience and /or training and to enable them to move into regular employment. Work experience assignments may not replace the employment of a regularly employed individual and they must provide the same working conditions provided to regularly employed individuals performing comparable work for comparable hours.

Work Experience may include activities such as on-the-job training, pre-apprenticeship or apprenticeship placements. The following criteria is to be considered in developing components. For example:

- On-the-job Training- A work placement made through a contract with an employer or registered apprenticeship program sponsor in the public, private nonprofit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's SSP.
- Pre-Apprenticeship/Apprenticeship- A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation. Apprenticeship programs can be sponsored by individual employers, joint employer and labor groups, and/or employer associations. Pre-apprenticeship programs provide individuals with the basic and technical skills necessary to enter an

apprenticeship program and should be directly linked to an apprenticeship program.

- Internship or Work Experience- a planned, structured learning experience that takes place in a workplace for a limited period of time.

Work Experience sites are developed by IMPACT Office staff and approved by the Division of Family Resources (see *Section 2540.10.30.05* above). Providers must also comply with the daily supervision and attendance requirements and all other conditions outlined in the Work Experience Agreement between the IMPACT Office and the employer as described in *Section 2540.10.30* above.

But unlike CWEP, **SNAP Work Experience** placements may be with private **for-profit** as well as public sector entities, and have a 20 hour weekly work requirement, or 80 hours per month (see "Calculating Participation Hours" below).

Participants must be monitored weekly to identify and resolve problems. Job performance is to be evaluated at least monthly, or more often, if needed. Actual hours of participation are recorded on SF 44720-RECORD OF IMPACT ATTENDANCE. Documentation of participation hours is sent to the IMPACT case manager at least monthly and recorded in the System of Record (SOR).

A review of the participant's Self-Sufficiency Plan (SSP) must be completed after three (3) months to determine if the employer intends to hire the individual within the next 60 days. If not, the participant is to be placed at another Work Experience site, or in another activity within 180 days of the initial date of placement. If the employer expresses an intent to hire the participant within three (3) months or less, the placement may be extended for up to nine (9) months.

Calculating participation hours: The IMPACT case manager will calculate the number of monthly hours a client may participate using the same formula described in *Section 2540.10.30.10* above for CWEP participation for SNAP only recipients.* However, if their calculated hours total less than 20 per week, ABAWDs may volunteer to supplement Work Experience with additional hours either in Work Experience alone, or in combination with another countable activity,

to meet the work requirement of 20 hours per week for a total of 80 hours per month.

*When more than one AG member is required to participate, the Work Experience hours may be apportioned among those AG members, and may not exceed the maximum number of hours determined by the formula.

SNAP benefits received by the participants are not considered wages, nor are participants considered to be employed.

2540.10.40 Community Service Programs (C, I)

Community Service Programs are structured programs in which TANF recipients perform work that directly benefits the community through the support of public or nonprofit organizations. Currently, VISTA and AmeriCorps* State programs are acceptable community service programs in Indiana.

Self-initiated community service activities must be approved by IMPACT Office staff to determine if the activity and service site can comply with the daily supervision and attendance requirements and all other conditions outlined in the Community Service Agreement between the IMPACT Office and a Community Service provider.

Calculating participation hours: Since participation in community service activities is subject to the same hourly restrictions as CWEP, the IMPACT case manager will calculate the number of weekly hours a client may participate using the same formula described in Section 2540.10.30.10 above for CWEP. Actual hours of participation are recorded on attendance and/or activity logs and participants are supervised daily. Documentation of participation hours is sent to the IMPACT case manager at least monthly and is recorded in the System of Record (SOR).

2540.10.40.05 Vocational Training (S,I)

Vocational Training means short-term educational programs where individuals prepare for employment in current or emerging occupations requiring training. The training may last from a few weeks up to a maximum of twelve months. There must be reasonable expectation of new or upgraded employment resulting from the training documented in the

Self-Sufficiency Plan (SSP). Examples of Vocational Training include, but are not limited to, licensed practical nurse (LPN), data entry operator, auto mechanic, welder, certified nursing assistant (CNA) and dental assistant. All Vocational Training activities must be accredited or licensed by the appropriate State agency. Educational institutions must be approved for Federal and State grants.

Note: Privately owned vocational and trade schools that do not serve the general public (for example, tuition is paid by a sponsoring business or agency), are not subject to accreditation by the Commission on Proprietary Education.

Counting participation hours: If the Vocational Training Program is appropriate, the total number of weekly course credits plus allowable class time reported and verified on the Client Attendance Report, SF 47826/IMP 0009, are countable. Countable hours include up to one hour of unsupervised homework time for each hour of class time if advised or required by the instructor. The participant must make satisfactory progress in the institution, school, or course. Satisfactory progress is defined as maintaining at least a "C" average or its equivalent at the educational institution or facility. All educational institutions of Vocational Training must be in-state and public except for the exceptions below.

Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists. For example: The course work is not available at a public or in-state institution; the public or in-state institutions have a waiting list that would require more than one semester wait. Employers are more likely to hire individuals who receive their training from a local private institution, or the overall cost to the IMPACT program (including supportive services) is less than at the public or in-state institution.

Attendance at an out-of-state institution may be approved only for a participant who lives in a county which borders another state. IMPACT staff will review and approve all extenuating circumstances. IMPACT will not pay for supplies such as notebooks, paper, pencils, pens, briefcases or clothing. The institution and participant agree to provide attendance records on the appropriate State Form, and grade reports at specified intervals.

All Vocational Training programs must be approved by the IMPACT supervisor or case manager, or a designee, in writing affirming that: the local job market offers employment opportunities in the area of training that the participant is requesting; and that the participant appears to have the motivation and aptitude to complete the training.

2540.10.45 Job Skills Training (C, I)

Job Skills Training is training or education directed toward gaining a specific skill in order to obtain employment, or to advance or adapt to the changing demands of a participant's current employment.

Job Skills Training is not subject to a durational limit, but is only countable as a "non-core" activity when combined with 20 hours per week in a "core" activity.

Job Skills Training can include four-year bachelor or advanced degree programs at any State certified college or university as well as all services and programs described in the Vocational Educational Training activity below. This means that TANF participants who have used up their 12 month lifetime eligibility for Vocational Educational Training can continue to be counted under Job Skills Training as a "non-core" activity if they are employed or seeking employment concurrently for a minimum of 20 hours per week, or participating in a CWEP.

Job Skills Training may be offered when it is:

Determined that the local job market has employment opportunities in the area in which training is offered, and

The participant has the interests, aptitude and motivation to complete the training. The participant is expected to make "satisfactory progress" throughout the training which is defined as a "C" average or its equivalent.

IMPACT supportive services funds will not pay for supplies such as notebooks, paper, pencils, pens, briefcases, or clothing (other than items such as uniforms, scrubs, or steel-toed boots specifically required for participation in

an assigned activity, which are not part of the client's normal wardrobe).

Job Skills Training Programs must be accredited and/or licensed by the appropriate State agency. If the provider is an educational institution, the training must be in-state and public. Exceptions may be made for out-of-state or private institutions when:

- The course work is not available at a public or in-state institution.
- The public or in-state institutions have a waiting list that would cause a lengthy wait.
- Employers are more likely to hire individuals who receive their training from a local private or out-of-state institution.
- The overall cost to IMPACT (including supportive services) is less than at the public or in-state institution.
- Attendance at an out-of-state institution may be approved only for a participant who lives in a county which borders Indiana.

2540.10.45.05 Job Skills Evaluation and Job Skills Training (S, I)

Job Skills Evaluation and Job Skills Training provide SNAP IMPACT volunteers, and ABAWDs with the opportunity to determine their occupational interests and aptitudes, and current job skills level. Classes are short term and are held in locations convenient for the participant. (See *Section 2540.05.00, #2.* on reporting IMPACT hours for instructional certificate programs and industry skill certification.)

2540.10.45.10 FSSA Funded Job Skills Training Program - JST (S, C, I)

A **Job Skills Training (JST) Program** funded by the Family and Social Services Administration (FSSA) is available to TANF recipients, SNAP IMPACT volunteers and ABAWD E&T participants who in general have been participating

successfully for more than 30 consecutive days since the completion of Orientation, have an IMPACT history (if any) of compliance and is highly motivated to succeed.

The type of training offered must be cost effective relative to comparable trainings available, is determined by the demands of the local job market and the expectation of employment immediately following the completion of training or soon thereafter. Additional criteria is outlined below:

Hierarchy of Need criteria: Funding for individual participants is dependent upon the availability of funds and the following Hierarchy of Need in which priority is given to participants who:

- Lack **both** job skills and experience in areas of high demand for labor;
- Have **barriers** to employment, but are otherwise job ready, and
- Have **limited** job skills and need additional training to advance to a higher level.

NOTE: Funding for an individual participating in a FSSA JST Program may be up to a maximum of \$3,500 in a twelve (12) month period with a lifetime limit of \$5,500.

Program eligibility prerequisites: In addition to complying with the requirements of their Self-Sufficiency Plan (SSP), lacking job skills and experience in areas of high demand, and have completed the FSSA Funded Job Skills Training Procedures and Checklist, SF 56375 which includes the following:

1. A high school diploma, GED certification or HSE diploma;
2. Expressed an interest and commitment in improving their employment preparedness, and
3. Completed a Career Assessment to determine their aptitude and career interests.

Approval criteria: If selected for this Job Skills Training Program, the course of study must be State of Indiana approved - DWD/WIOA - and:

1. Consistent with the interests and aptitude indicated on the Career Assessment;
2. In an area of the local job market with employment opportunities, and
3. Within an acceptable commuting distance from the participant's residence.
4. If eligible, participants must apply for Financial Aid such as Pell Grants, etc.

*IMPACT Policy will review, pre-approve and make a determination on all submitted training requests. Approved trainings must be documented in case notes.

Training may be provided by vendors listed on the current Department of Workforce Development (DWD) approved training vendor list found at:

<https://webapps.dwd.in.gov/INTraining/search-flow.htm?execution=e2s1>

The training may not exceed sixteen (16) weeks, and may include post-secondary certificate programs consisting of several short term classes required for certification or licensure. Training resulting in a certification shown on the most current fiscal year WorkINdiana framework may be found at: http://www.in.gov/dwd/adulted_workin.htm

Counting Job Skills Training Hours: TANF recipients, SNAP volunteers, and ABAWD E&T participants must track "actual time" spent in JST activities. Hours are to be recorded on the Client Attendance Report (SF 47826 - *check JST box only*) which is to be signed and dated by the instructor to verify attendance and submitted to the case manager weekly. Participants may report classroom hours plus homework time, if applicable, or "hours only." (See *Section 2540.05.00, #2.* on Reporting IMPACT Hours.)

When course credits are assigned to short term skills training and certification programs, the total number of weekly homework hours required or advised in writing by the instructor/trainer in each course may not exceed the scheduled weekly course credits or class hours; participants must maintain a "passing grade" according to

the standards of the institution providing the training.

Participants who fail to complete their FSSA Funded Job Skills Training assignment may be subject to a case review to determine their eligibility for future training.

2540.10.50 Vocational Educational Training (C, I)

Vocational Educational Training (*12 month lifetime limit per individual*) refers to short-term educational programs that are directly related to the preparation of individuals for employment in current or emerging occupations requiring training. The training may last from a few days or weeks up to a maximum of twelve months.* There must be reasonable expectation of new or upgraded employment resulting from the training documented in the Self-Sufficiency Plan (SSP).*See *Section 2540.10.45* for Job Skills Training following the 12 months lifetime limit of Vocational Educational Training.

Examples of Vocational Educational Training include, but are not limited to, licensed practical nurse (LPN), data entry operator, auto mechanic, welder, certified nursing assistant (CNA) and dental assistant. Currently, education leading to a bachelor's or other advanced degree may count for 12 months of Vocational Educational Training (*not applicable to SNAP recipients*).

*All Vocational Educational Training activities must be accredited or licensed by the appropriate State agency. Educational institutions must be approved for federal and State grants.

Prior to approving Vocational Educational Training, the IMPACT case manager must determine:

- If there is a reasonable expectation of new or upgraded employment in current or emerging occupations requiring training and document this in the SSP.

Recipients who have used their 24-month time limit for cash benefits may participate in Vocational Educational Training as long as they have an open TANF case and are cooperating with IMPACT requirements.

Counting participation hours: If the Vocational Educational Training Program is appropriate, the total

number of weekly course credits plus allowable unsupervised study time reported and verified on the Client Attendance Report, SF 47826/IMP 0009, are countable if the participant is employed (including Work Study) or participating in another activity a sufficient number of hours to meet the 20 or 30 hours per week participation requirement. Because Vocational Educational Training is a core activity, there may be instances in which the combined number of weekly course credits and unsupervised study hours will be sufficient to meet the 20 or 30 hours weekly participation requirement. Refer to *Section 2540.05.00* on "Reporting IMPACT Hours" for educational activities.

The participant has and must continue to make satisfactory progress in the institution, school, or course. Satisfactory progress is defined as maintaining at least a "C" average or its equivalent at the educational institution or facility.

If the training is provided in an educational institution, Vocational Educational Training must be in-state and public. Exceptions may be made for out-of-state or private institutions when an extenuating circumstance exists. *See 2540.10.45 for allowable exceptions.

IMPACT will not pay for supplies such as notebooks, paper, pencils, pens, briefcases, or clothing.

The institution and participant agree to provide attendance records on the appropriate State Form, and grade reports at specified intervals.

All Vocational Educational Training programs must be approved by the IMPACT case manager, or a designee, *in writing* affirming that:

- The local job market offers employment opportunities in the area in which the participant is pursuing training;
- The participant has the motivation and aptitude to complete the training, and
- The training is likely to result in employment.

2540.10.55 Self-Initiated Vocational Training (C,I)

Participants who are already attending an institution of

higher education or a Vocational Training Program when they become mandatory for TANF are considered to be in Self-Initiated Vocational Training.

An Assessment and Self-Sufficiency Plan must be completed for a self-initiated participant to determine the appropriateness of the Vocational Training activity and what assistance the participant may need to successfully complete the training.

Once the IMPACT case manager determines that the Vocational Training is appropriate, a self-initiated participant is subject to the same criteria described above for non Self-Initiated Vocational Training including the reporting of IMPACT participation hours for activities described in *Section 2540.05.00*.

2540.10.60 Distance Learning (C, I)

Distance Learning means Vocational Educational Training performed off-site via the internet or correspondence. Distance Learning is subject to the same reporting requirements as on-site educational activities.

The number of weekly course credits in which the client is enrolled must be documented by the institution and pre-approved by the IMPACT Office. Once classes begin, the IMPACT Office must receive verification from each instructor by fax or e-mail on State Form 54448/IMP 0047, RECORD OF IMPACT ATTENDANCE - Distance (Internet/Correspondence) Learning, that the participant completed the necessary work required for that week in order for the client to receive credit for IMPACT participation. Clients may also hand deliver the completed form to the IMPACT Office by the due date indicated on their SSP.

Counting participation hours: In addition to each "online" course credit, participants may receive one hour of credit per week for unsupervised study for each course credit if advised or required *in writing* by the instructor

Weekly participation hours may not exceed the predetermined number of scheduled hours reflected in the System of Record (SOR) based on the weekly course credits and no more than one hour of study time per credit. Additional study hours accumulated in one week may not carry over to the next. Consequently, participation hours may reflect *less than*,

but *never more than*, the weekly scheduled hours recorded in the SOR. See *Section 2540.05.00* on "Reporting IMPACT Hours".

2540.10.65 Educational (Academic) Activities (S, C, I)

There are four types of educational or academic activities:

1. High School Equivalency Diploma (HSE),
2. High School (HS),
3. Adult Basic Education (ABE), and
4. English as a Second Language (ESL).

NOTE: High School and HSE preparation are "core" activities for TANF recipients age 19 and under who are heads of household, but are "non-core" activities for TANF recipients age 20 and older. Therefore, a teen parent/caretaker age 19 and under is considered to be meeting the work participation rate requirement when the individual is satisfactorily attending high school or HSE classes (no hourly requirement).

For **ABAWDs**, when Supervised Job Search is combined with the above Educational (Academic) Activities, it must comprise less than 50% of the 20 hours per week work requirement.

**2540.10.65.05 High School Equivalency Diploma - (HSE)
(S, C, I)**

High School Equivalency (HSE) test preparation is defined as classroom instruction to assist a participant who has not graduated from high school to obtain the HSE Diploma. The test measures the individual's level of achievement relative to that of graduating high school seniors as well as readiness for college and the workforce. It is available in paper-and-pencil form and on-line, both equally rigorous.

Upon completion of HSE classes, the participant will take the HSE test. Individuals who pass the test will receive a High School Equivalency Diploma from the state (not to be confused with a High School Diploma).

To be eligible to take the test, a participant must meet all local and state requirements, be at least 16 years old, not subject to compulsory school attendance, and not a high school graduate or currently enrolled in high school.

At age 18, the participant is no longer subject to Indiana compulsory school attendance laws and, therefore, meets the eligibility requirements for taking the HSE test.

The participant must provide justification that the individual is prepared to take the test, and obtain pre-approval from IMPACT supervisory staff to pay the fee. The HSE test fee is a one-time only (lifetime) payment regardless of whether the individual passes or fails the test.

Once the test has been administered, the test center will provide the IMPACT Office with verification of the testing date and scores.

Counting participation hours: HSE preparation is considered a "core" activity for TANF recipients age 19 and under who are heads of household, and a "non-core" activity for TANF recipients age 20 and older.

For **ABAWDs**, when HSE preparation does not meet the 20 hours per week work requirement and is combined with Supervised Job Search, Supervised Job Search activities must comprise less than half (<50%) of the 20 hours.

Participants must record and instructors must verify participation on SF 44720 /IMP 2077, RECORD OF IMPACT ATTENDANCE, for every hour of class time for every day of every month. Countable hours include supervised study activities and up to one hour of unsupervised homework time for each hour of class time if advised or required *in writing* by the instructor. Attendance and excused absences must be recorded in the System of Record. **See Section 2540.05.00** on "Reporting IMPACT Hours" for educational activities.

2540.10.65.10 High School (S, C, I)

High School (or secondary school attendance) is defined as credit for classes needed by a participant to obtain a high school diploma. Instruction is provided at a secondary school. The schedule of classes and hours of participation are known to the IMPACT case manager prior to approval of the activity and are documented in the individual's Self-Sufficiency Plan. High school attendance is considered a "core" activity for TANF recipients age 19 and under who are heads of household.

Counting participation hours: There is no hourly participation requirement for a teen parent/caretaker age 19 and under who is satisfactorily attending high school. The number of participation hours is obtained from verified school attendance records. Daily attendance must be reported at least monthly to the IMPACT case manager. For the hours to be counted, the individual must maintain at least the minimum passing grade required for receiving a high school diploma. Educational activities, hours of attendance, and excused absences are to be recorded in the System of Record.

For ABAWDs, when HSE preparation does not meet the 20 hours per week work requirement and is combined with Supervised Job Search, Supervised Job Search activities must comprise of less than half (<50%) of the 20 hours.

2540.10.65.15 Adult Basic Education - ABE (S, C, I)

Adult Basic Education (ABE) is educational training directly related to employment. Instruction is designed to improve a participant's reading and math skills (at least to an 8.9 grade level) and enhance basic academic and life skills competencies. ABE classes are offered to adult participants who:

- (a) Are non-high school graduates* who score in the low range on math and reading evaluations, and
- (b) Need further education to enter a specific occupation, obtain employment, or accept an offer of employment.

*Occasionally, a client may already have a high school diploma, GED, or HSE diploma, but needs remedial instruction in a particular area like math or reading in order to make him/her employable.

For **ABAWDs**, when ABE classes do not meet the 20 hours per week work requirement and are combined with Supervised Job Search, Supervised Job Search activities must comprise less than half (<50%) of the 20 hours.

Counting participation hours: Participants must record and instructors must verify actual hours of participation on State Form 44720/IMP 2077, RECORD OF IMPACT ATTENDANCE, for every day of the week in each month. Countable hours include supervised homework and study activities and up to

one hour of unsupervised homework time for each hour of class time if advised or required *in writing* by the instructor. Total unsupervised homework hours may not exceed the number of hours required or advised for the educational program. Client must also attain a "passing grade," or its equivalent, according to the standards set by the educational institution. Attendance and excused absences are to be recorded in the System of Record. See *Section 2540.05.00* on "Reporting IMPACT Hours" for educational activities.

2540.10.65.20 English as a Second Language - ESL (S, C, I)

English as a Second Language (ESL) is defined as instruction in English for those whose native language is not English. These participants need assistance with speaking, reading, writing and comprehending the English language.

For **ABAWDs**, when ESL classes do not meet the 20 hours per week work requirement and are combined with Supervised Job Search, Supervised Job Search activities must comprise less than half (<50%) of the 20 hours.

Counting participation hours: Participants may need assistance from the instructor to record actual hours of participation on State Form 44720/IMP 2077, RECORD OF IMPACT ATTENDANCE, for every day of the week in each month. Countable hours consist of supervised homework and study activities verified by the instructor, and up to one hour of unsupervised homework for each hour of class time if advised or required *in writing* by the instructor. Total homework time cannot exceed the hours required or advised by the education program. Client must attain a "passing grade" or its equivalent according to the standards established by the educational institution. See *Section 2540.05.00* on "Reporting IMPACT Hours" for educational activities.

The participant must submit attendance records to the IMPACT Office or IMPACT case manager at least monthly. Attendance is verified through the participant's grade reports and by the educational institution at designated intervals. Attendance and excused absences are to be recorded in the System of Record.

Since the scheduled hours of participation are known by the IMPACT case manager prior to approval of the activity, they

must be documented in the Self-Sufficiency Plan.

2540.10.70 On-the-Job Training - OJT (C, I)

On-the-Job Training (OJT) is defined as training in the public or private sector provided to a paid employee while he or she is engaged in productive work to gain the knowledge and skills essential to the full and adequate performance of the job.

The training is:

Supervised,

Occupational specific,

Provided for a specific period of time, and

Under a contractual agreement.

OJT is distinguished from subsidized employment by the inclusion of a training plan as part of a contractual agreement. The training plan consists of a formal written program of the structured job training that provides the participant with instruction in work skills, general employment competencies, and occupation specific skills to enable the individual to work toward achieving self-sufficiency.

Upon completion of the OJT, the participant remains on the payroll of the employer.

The following criteria and procedures apply to TANF IMPACT funded OJTs:

The participant's current skill level, work experience, interests, prior trainings, education and aptitude are assessed to determine the appropriateness of an OJT activity.

To the extent possible, an OJT activity must relate to the participant's interests and abilities.

An OJT contract cannot be written with an employer who:

1. Employs the participant to perform political or sectarian activities; or

2. Continuously terminates or lays off participants without just cause; or
3. Has an employee affiliated with the training provider or the Division of Family Resources with any personal or financial interest—direct or indirect—in the OJT contract; or
4. Places a participant temporarily on the employer's payroll to perform services at another employer's establishment.

An OJT contract may only be written with an employer who:

1. Is providing full-time, permanent, long term employment;
2. Agrees to contact the IMPACT case manager for assistance in helping alleviate any problem(s), and
3. Will provide Worker's Compensation or the equivalent to cover medical care for on-the-job injuries and provide accident (tort claim) protection for on-site injury.

An IMPACT case manager must establish and submit an OJT marketing strategy to Central Office IMPACT containing the types of jobs that will be marketed, and the qualitative measures for making good or satisfactory progress.

An IMPACT case manager shall monitor the OJT contracts monthly and complete the ON-THE-JOB TRAINING REVIEW DOCUMENT to ensure that each client placed in an OJT is receiving training that will provide the knowledge and skills essential to the adequate performance of the job. Effective monitoring includes interviewing the participant and the employer/supervisor separately to determine if:

1. The participant is making satisfactory progress;
2. The participant is provided with the skills outlined;
3. The employer and/or the participant need help to resolve problems which affect the job;

4. The training will be completed by the designated date, and
5. The participant is obtaining the same wages and benefits as similarly situated employees or trainees and are working the hours designated on the contract.

The IMPACT case manager or State staff should attempt to informally resolve any issues before any formal complaint procedure is initiated. If an informal solution does not lead to satisfactory resolution, the participant is to follow the grievance procedure of the employer and/or file directly with the directorate of Civil Rights at the address below within 180 days of the alleged violation.

Directorate of Civil Rights
U.S. Department of Labor
200 Constitution Avenue, NW Room N-4123
Washington, DC 20210

If the employer does not have a formal grievance procedure, the client may file a complaint with the IMPACT case manager in the IMPACT Office and/or the Directorate of Civil Rights.

When developing an ON-THE-JOB TRAINING AGREEMENT, IMPACT Central Office will secure the signatures of the applicable State agencies and the employer once the Attachment A of the contract has been submitted for approval. In addition to the Attachment A, the IMPACT RECORD OF CLIENT DATA TANF ON-THE-JOB TRAINING Form must be completed by the IMPACT case manager for each participant placed with the employer. Once completed and mailed to the IMPACT Central Office, the IMPACT RECORD OF CLIENT DATA TANF ON-THE-JOB TRAINING Form becomes part of the STATE ON-THE-JOB TRAINING AGREEMENT. Prior to the development of the OJT, the contract boiler plate must be approved by IMPACT Central Office and must include:

1. A brief job description;
2. A training plan listing the skills required to perform the job and the length of time to learn each skill;
3. The "begin" and "end" dates of the contract;

4. The total number of day/weeks required to complete the training, and
5. The following wage and benefit information:
 - Rate of reimbursement;
 - Hourly wage paid to the participant;
 - Total amount to be reimbursed;
 - Hourly wage the participant will receive at the end of 180 days beginning with the "start" date of the OJT employment, and the
 - Health benefits the participant will receive within 90 days from the "start" date of the OJT training program.
6. The participant's name and social security number;
7. The supervisor/trainer's name (the trainer must have the expertise determined by the employer to provide the training for the skills required in performing the job);
8. The bargaining unit's name and signature of the approving union official when a collective bargaining agreement covers the OJT position;
9. A clause stating that health care benefits will be provided during the period of the contract if similarly situated employees or trainees receive these benefits. If health benefits are not provided during the period of the contract, the employer must have a policy in place to provide health benefits within 90 days of employment;
10. The terms and conditions applicable in the contract between Indiana Family and Social Services Administration, Division of Family Resources, and any Coordinator who is involved;
11. A nepotism clause stating that no participant is

allowed to participate in any On-the-Job Training activity if a member of the participant's immediate family is engaged in any administrative capacity or in a direct supervisory-subordinate relationship;

12. A statement of the employer personnel policy that the employer will provide the participant a copy of the benefits and grievance procedures, and any specific rules and regulations by which the participant is expected to abide;
13. A clause stating that the employer will provide Worker's Compensation or the equivalent to cover medical care for injuries sustained on the job and provide accident (tort claim) protection for on-site injury, and
14. An assurance clause stating that the employer will not displace any currently employed worker or position with an OJT participant, or use OJT participants to fill established, vacant employment positions (1) when any other individual is on lay-off from the same or any equivalent job, or (2) the employer has terminated the employment of any regular employee, or (3) has otherwise caused an involuntary reduction of its workforce in order to fill the vacancy created with an individual receiving IMPACT services after the employer has made a demonstrated effort to fill the position. If the position is covered by a union agreement, a demonstrated effort to fill the position includes compliance with past practice procedures and all negotiated processes covered by applicable union agreements for filling vacancies. If the position is not covered by a union agreement, demonstrated effort shall include advertising the vacancy in the local newspaper or listing the vacancy with local Office of Workforce Development. An established worker's non-overtime hours, wages, promotional opportunities, transfer rights or employment benefits may not be reduced or infringed upon. Individuals placed into an OJT training program may not impair existing contracts for services or collective bargaining agreements.

The length of training may not exceed 130 day/26 weeks. Contracts can be extended due to paid holidays, scheduled plant shutdowns, and sick leave; however, actual training time cannot exceed 130 days/26 weeks.

To determine the maximum number of days/weeks of training for a specific occupation, the following steps must be followed:

1. The employer must provide a job description in writing;
2. The Dictionary of Occupation Titles (DOT) must be used to determine the skill level of the job description by matching the description with the occupational title and nine-digit code number assigned to that title. At the end of the definition under "Term Titles and Definitions", the skill level known as the "Specific Vocational Preparation" (SVP) is listed after the definition. This code provides guidance on the length of training required to learn the job. The skill levels range from 1-9. The Dictionary of Occupation Titles can be obtained through JIST Works, Inc. The IMPACT Section of DFR must follow the State procurement procedures.

Transfer the SVP into training maximum days/weeks by following the formula below:

| <u>SPV Level Code</u> | <u>Maximum Days/Weeks</u> |
|-----------------------|---------------------------|
| 1 - 2 | 30 days/ 6 weeks |
| 3 | 45 days/ 9 weeks |
| 4 | 90 days/18 weeks |
| 5 - 6 | 130 days/26 weeks |

The number of weeks of training is determine b the actual training time for the job and the specific time required for a participant to learn each specific task.

Examples include a participant who:

- (a) May have difficulties learning a job and may require additional weeks beyond the normal training time, or

- (b) Exhibits knowledge of several tasks outlined in the training plan and may require fewer weeks than normally required to complete the training.

The maximum number of days/weeks for training should only be allowed when the employer states that the number of training days/weeks for the job will exceed the maximum number of days/weeks allowed for the SVP level. To determine the actual number of days/weeks the following must be taken into account:

The number of days/weeks that the employer states it will take to train a person in the job;

The TANF participant's knowledge of several tasks outlined in the training plan;

The TANF participant's capability to perform the job, and;

The maximum number of days/weeks for the SPV level.

Payments to an employer for OJT shall not exceed an average of 50% of the wages paid by the employer to the participant during the period of such training. The average maximum percentage of wages to reimburse the employer depends on the skill level of the specific occupation. The IMPACT case manager may negotiate the contract for a lower reimbursement rate. Wage reimbursement for SVP levels may not exceed the following:

| <u>SPV Level Code</u> | <u>Maximum Reimbursement</u> |
|-----------------------|------------------------------|
| 1 - 2 | 25% |
| 3 | 35% |
| 4 - 5 | 50% |

An employer may not be reimbursed for hours that the participant did not work such as paid holidays, vacations, sick leave, etc., or for hours that exceed 40 hours a week.

The employer will submit monthly:

1. A letter on company letterhead detailing the name, social security number of the participants, the total reimbursement for the OJT, the number of hours worked, total wages, the reimbursement rate and the wages being reimbursed for each

participant.

2. The payroll record for each participant;
3. The attendance record for each participant, and
4. The appropriate State claim-voucher.

The employer must provide the participant a copy of the "Benefits and Grievance Procedures," specific rules and regulations by which the client is expected to abide, and a copy of the training program.

Within 90 days from the date that the participant begins the OJT, the employer must provide the participant affordable health insurance benefits not to exceed 5% of the gross wages, unless the community norm exceeds 5%.

Within 180 days from the beginning of the contract, the participant must receive at least \$6.25 an hour for SVP levels 1-2; \$6.75 an hour for SVP level 3; and \$7.50 an hour for SVP levels 4-6.

Wages paid to a participant in an OJT will be considered earned income.

If a participant becomes ineligible for TANF benefits, the individual will remain an IMPACT participant for the duration of the OJT contract and will be eligible for all appropriate IMPACT supportive services, if needed. The employer remains eligible for reimbursement of the training cost for the duration of the original OJT contract.

No SNAP IMPACT funding (including supportive services) can be utilized. If non-IMPACT funding is available, the service provider may locate and write a contract with an employer for a specific job. The contract must contain at a minimum the:

Job duties;

Wages to be paid, (at least federal minimum wage);

Hours to be worked;

Length of the training, and

Non-displacement language (See *Section 2540.10.00*).

The length of the contract may last from one (1) to six (6) months.

Counting OJT participation hours: The number of actual participation hours is determined by written documentation from the employer through pay stubs or other employer-produced documents substantiating the hours worked and are to be recorded in the appropriate automated systems.

2545.00.00 NON-COMPLIANCE DEFINITION (C, I)

The following actions constitute failure to comply with IMPACT Program requirements for TANF, and will require a *good cause* determination:

- Failure to attend a scheduled Orientation/Assessment Interview;
- Failure to attend a scheduled Self-Sufficiency Plan development appointment;
- Failure to provide required documentation of participation in assigned IMPACT activities;
- Failure to participate 100% in any assigned IMPACT activity;
- Refusal or failure to attend a scheduled job interview;
- Refusal or failure to seek, accept, and maintain employment at 20 hours or more per week at minimum wage or higher;
- Refusal or failure to cooperate with any other service agency to which referred through the IMPACT Program.

2545.05.00 Non-Compliance with IMPACT Program Requirements (C, I)

For Two-Parent TANF and Regular TANF AGs, non-compliance with IMPACT applies to the individual's failure to participate *without good cause* in activities scheduled by, or with, the IMPACT case manager, and included on the Self-Sufficiency Plan (SSP).

When TANF IMPACT mandatory individuals do not comply with IMPACT Program requirements:

1. A Notice of Non-Compliance with IMPACT

Requirements is generated by the System when the failure date of the participant's non-compliance is entered in the SOR, and

2. The applicable minimum sanction period is initiated simultaneously. (See *Section 2545.15.05* for minimum sanction periods.)

The Notice of Non-Compliance gives the deadline for the participant's good cause response which is thirteen (13) calendar days from the date the Notice is mailed. If the 13th day falls on a weekend day or holiday, the deadline is the first working day after the weekend or holiday. In addition, the Notice explains the participant's right to appeal the sanction timely, and the appeal process.

If the participant:

1. Responds in writing *with good cause* by the deadline stated on the Notice, the sanction is to be deleted in the Eligibility System. The Case Manager should document the good cause and schedule the participant to develop a new Self-Sufficiency Plan (SSP) as soon as the circumstance(s) that resulted in the good cause no longer exists. (See *Section 2545.10.05* for the Levels of Authority for determining good cause.)
2. Responds *without good cause* by the deadline stated on the Notice and demonstrates compliance* *while serving the penalty period*, the minimum sanction period must be served. (Individuals who appeal their sanction timely and continue to receive TANF benefits remain eligible for IMPACT services.) *See *Compliance Requirements* below.
3. Fails to respond by the deadline stated on the Notice and *does not have good cause*, the individual must serve the minimum sanction period and demonstrate compliance, *whichever is later*, or

4. Fails to respond by the deadline stated on the Notice because of unusual or extraordinary circumstances, and *provides good cause* at a later date, the sanction is to be deleted in the Eligibility System.

IMPACT Compliance Requirements: Effective November 1, 2011, "demonstrate compliance" means that the sanctioned individual must:

1. Re-apply for TANF Cash Assistance, and
2. If determined mandatory for IMPACT participation, complete Applicant Job Search (AJS) Orientation, and participate successfully in AJS activities for a minimum of twenty (20) days for at least four (4) hours each day within a sixty (60) day time frame.

NOTE: Individuals sanctioned prior to May 2011 (zero count sanction in the Eligibility System who are referred to AJS and demonstrate compliance by successfully completing AJS Orientation will have their sanction end-dated using the last day of the month of application. However, the AJS requirement of twenty (20) days of participation must be completed before their TANF application can be approved as long as all eligibility requirements are met.

AJS participants are *not* to be assigned to Community Service or Community Work Experience Program (CWEP) activities.

At re-application, if the sanctioned individual is determined mandatory for IMPACT participation and is serving, or has served, the minimum penalty period and completes the AJS requirements, the sanction will be end-dated using the date of the last day of the month of application, or the end of the minimum sanction period, *whichever is later*.

NOTE: Sanctioned individuals should not re-apply for TANF benefits prior to the last month of the minimum sanction period. The eligibility worker may not change sanction code 34 to code 05 in the Eligibility System until the last month of the penalty period.

2545.05.05 Case Manager Responsibilities for Non-Compliance (C, I)

In addition to the initial Assessment and the development of the Self-Sufficiency Plan (SSP) with each TANF applicant and recipient, the IMPACT case manager is responsible for:

Ensuring that the applicant's AJS status is accurately displayed in the Eligibility System as 'N' for non-compliance with AJS.

Refer to *Section 2510.00.00, Applicant Services*, for policy regarding a TANF applicant's non-compliance with AJS requirements.

The IMPACT case manager must also determine Level I good cause when a TANF recipient fails to comply with an assigned IMPACT activity. (See *Section 2545.10.05* for Levels of Authority for determining good cause.)

2545.10.00 IMPACT GOOD CAUSE DETERMINATION (C, I)

The policy stated in this section applies only to Two-Parent TANF and Regular TANF Assistance Groups (AGs).

A determination that good cause exists for non-compliance with IMPACT Program requirements shall be made in accordance with the process described in *Section 2545.10.05*.

- I. For occurrences of non-compliance with the Self-Sufficiency Plan (SSP) which are not related to Voluntary Quit or Reduction of Hours/Earnings, good cause reasons are limited to the following:
 1. The required actions were beyond the capability of the participant to perform, or the circumstances were beyond the individual's ability to control. Examples of such circumstances would be:
 - a. Child care for a child under age six (6) which is necessary for the individual to participate or continue to participate in the IMPACT Program, or to accept and/or maintain employment, is not available;
 - b. A breakdown in transportation arrangements with no ready access to alternative transportation;

- c. Illness or hospitalization of the participant verified by a licensed medical professional: physician, physician assistant, psychologist, nurse practitioner, registered nurse, practical nurse, or other medical professional;
 - d. The individual was a victim of domestic violence;
 - e. A family crisis, or
 - f. Other unusual circumstances alleged by the participant.
- 2. The agency failed to provide the individual with the services needed to perform the required actions.

II. For occurrences of non-compliance with the requirements of the SSP related to voluntarily quitting employment (Voluntary Quit), good cause reasons include:

- 1. A substantiated incident of discrimination by any employer based on age, race, sex, color, handicap, religious beliefs, national origin, political beliefs, or marital status;
- 2. Work demands or conditions that render continued employment financially unacceptable, such as working without being paid on schedule;
- 3. Leaving a job in connection with patterns of employment in which workers frequently move from one employer to another, such as migrant farm labor or construction work;
- 4. The individual quit, with the approval of the IMPACT case manager, to accept a bona fide job offer that resulted in increased earnings and/or benefits;
- 5. The individual was unable to obtain or maintain necessary care for a minor child residing in the home, or

6. The employment site violated applicable state or federal health and safety standards.

III. For occurrences of non-compliance with the requirements of the SSP by voluntarily reducing earnings (Reduction of Hours/Earnings), good cause exists if:

1. The reduction was due to the inability to obtain or maintain necessary care for a dependent minor child residing in the home.

2545.10.05 IMPACT Good Cause Determination Process - Levels of Authority (C, I)

The Levels of Authority cited below for determining good cause for non-compliance with IMPACT Program requirements have been established in order to minimize the occurrence of situations that may require a good cause determination.

A determination that good cause exists for failing to cooperate with IMPACT Program requirements is limited to the following two (2) reasons:

1. The required actions were beyond the capability of the individual to perform, or the circumstances were beyond the individual's ability to control.
2. The agency failed to provide the services needed for the individual to perform the required actions.

Actions of non-compliance requiring a good cause determination include, but are not limited to, the following:*

1. Refusal or failure to comply with any IMPACT Program requirements.
2. Refusal to accept employment.
3. Termination of employment.
4. Reduction of employment hours.

See*Section 2545.10.00 for a complete list of good cause reasons.

Levels of Authority for Determining Good Cause for Non-Compliance:

I. **Case Manager (CM)**: IMPACT case managers have authority to grant a first request for good cause for the following reasons:

1. Lack of child care for a child under age 6,
2. A breakdown in transportation arrangements with no ready access to alternative transportation, and
3. Actions of non-compliance resulting in refusal or failure to comply with IMPACT Program requirements referenced in *Section 2545.00.00*.

The IMPACT CM must document efforts to eliminate barriers to participation, especially child care and/or transportation barriers that may have been addressed in the SSP, or may not have been a barrier prior to the first occurrence.

NOTE: The CM should seek supervisory assistance for determining good cause for non-compliance in situations involving unusual or extenuating circumstances.

II. **Supervisory:**

The Supervisor shall have authority to grant a second request for good cause reasons stated under the Case Manager Level I, and a first request for the following reasons:

1. Refusal to accept employment.
2. Termination of employment.
3. Reduction of employment hours.
4. Unsafe employment situations.
5. Illness or hospitalization of the participant verified by a licensed medical professional.

III. **Administrative:**

Authority to grant a third request for good cause for reasons listed under the Case Manager Level I, a second or third request for the reasons listed under the Supervisory Level II, and a first, second or third

request for the following reasons:

1. Domestic violence.
2. Family crisis, and/or
3. Other circumstances alleged by the participant to be beyond their ability to control.

The IMPACT case manager should be informed of the good cause determination decision within two (2) working days of receipt of the request for good cause consideration.

2545.15.00 SANCTION FOR IMPACT NON-COMPLIANCE (C, I)

The policy stated in this section applies only to Two-Parent TANF and Regular TANF Assistance Groups (AGs).

It is the responsibility of the IMPACT case manager to ensure that non-compliance information is reflected in the System of Record (SOR).

NOTE: In a Two-Parent TANF AG, both parents are required to comply with IMPACT Program requirements. A third sanction by either individual can lead to a lifetime disqualification from the TANF Program for the entire AG, and any subsequent AG in which the sanctioned individual is either the case head or a member.

2545.15.05 IMPACT Sanctions (C, I)

The policy stated in this sub-section affects only the IMPACT mandatory Two-Parent TANF and Regular TANF Assistance Groups (AGs).

IMPACT participants will have their AG closed if they fail or refuse, without good cause, to:

Attend a scheduled Orientation Workshop;

Complete a Self-Sufficiency Plan Assessment Interview and cooperate in developing a Self-Sufficiency Plan (SSP);

Comply with the participation requirements set forth in the SSP (f115a), or

Comply with IMPACT requirements.

Failure to cooperate with IMPACT requirements will result in a Notice of Non-Compliance with IMPACT Requirements, and the initiation of a Full Family Sanction on the same day. The only exception would be if the participant has requested a Voluntary Withdrawal (VW) *before* the Notice of Non-Compliance is generated.*

The Notice also gives the date of the thirteen (13) day deadline for the participant's good cause response, and explains the individual's right to appeal the sanction timely, and the appeal process. (See *Section 2545.05.00* on Non-Compliance with IMPACT Program Requirements.)

*A sanction may not be initiated if a participant requests a voluntary withdrawal (VW) from TANF prior to the individual's "non-compliance." The VW takes precedence and may be verbal or written. All staff should assist the individual in the VW process and ensure that the request is recorded in the SOR. (See *Section 2250.00.00*, VOLUNTARY WITHDRAWAL FROM ASSISTANCE.)

IMPACT Sanction Periods: As of November 1, 2011, the following minimum sanction periods will apply to non-compliant TANF IMPACT participants who do not have good cause. (See *Section 2545.10.00* for IMPACT good cause reasons):

First occurrence:

Loss of TANF Cash Assistance (CA) and eligibility for supportive services for the entire AG* for a minimum of one (1) month, or until the sanctioned individual demonstrates compliance, whichever is later. (*See *Section 2505.05.00* for Full Family Sanction and *Section 2545.05.00* for compliance requirements.)

Second occurrence:

Loss of TANF Cash Assistance and eligibility for supportive services for the entire AG for a minimum of three (3) months, or until the sanctioned individual demonstrates compliance, whichever is later. (See *Section 2545.05.00* for compliance requirements.)

Third occurrence:

Lifetime disqualification from the TANF Program for the entire Assistance Group, and any subsequent AG in which the sanctioned individual(s) is either the case head or a member.

Two-Parent TANF AGs: While each parent is allowed the first two (2) sanction occurrences, the first parent to incur the third sanction will initiate a lifetime disqualification from the TANF Program for the entire Assistance Group, regardless of whether the other parent has ever been sanctioned.

IMPACT staff are reminded that individuals who demonstrate compliance while serving a sanction, and continue to receive benefits following a timely appeal, remain eligible for IMPACT services.

The Notice of Non-Compliance with IMPACT Requirements also provides the individual with the opportunity to show good cause for the non-compliance. (See *Section 2545.10.00* for Good Cause Determination.)

1. If good cause for the non-compliance exists, the sanction will be deleted in the Eligibility System. The client should be re-engaged immediately when the good cause reason is no longer applicable.
2. If good cause for the non-compliance does not exist, the minimum penalty period must be served:
 - (a) If the individual re-applies and demonstrates compliance by completing Applicant Job Search (AJS) Orientation and twenty (20) days of AJS activities for a minimum of four (4) hours each day while serving the minimum penalty period, the sanction will be end-dated in the Eligibility System using the date of the last day of the minimum sanction period, or the last day of the month of re-application, whichever is later.
 - (b) If the individual re-applies after serving

the minimum penalty period, and demonstrates compliance by completing all AJS requirements, the sanction will be end-dated using the date of the last day of the month of re-application. If the individual does not complete all AJS requirements, his/her application will be denied.

The individual should not re-apply for TANF prior to the last month of the minimum penalty period.

Effective November 1, 2011, when a sanctioned individual re-applies for TANF and is determined mandatory for IMPACT participation, the individual will be required to attend Applicant Job Search Orientation and to participate for twenty (20) days in assigned AJS activities for a minimum of four (4) hours each day within a sixty (60) day time frame. Once the individual re-applies, serves the minimum penalty period, and successfully completes all Applicant Job Search requirements, the individual will be in compliance with IMPACT requirements. (See *Section 2545.05.00* for compliance requirements for individuals sanctioned prior to May 2011 with a zero sanction count.)

Exemptions during the sanction period:

1. If a sanctioned individual becomes exempt while serving the minimum sanction period, the individual must continue to serve the minimum penalty period. If the exemption still exists at the end of the penalty period and the individual re-applies for TANF, the individual will be exempt from IMPACT participation until the exemption reason no longer exists, and will not be required to demonstrate compliance with IMPACT requirements in order to regain TANF benefits. The sanction should be end-dated in the Eligibility System using the date of the last day of the minimum sanction period.
2. If a sanctioned individual becomes exempt while serving the minimum sanction period and the exemption expires before the end of the minimum sanction period, the individual must serve the minimum sanction period. If the individual re-applies and is determined exempt from IMPACT participation, the individual will not be required to demonstrate compliance with IMPACT requirements

in order to receive TANF benefits. The sanction should be end-dated in the Eligibility System using the date of the last day of the month of application.

3. If a sanctioned individual becomes exempt while serving the minimum sanction period and the exemption expires before the end of the sanction period, the individual must serve the minimum sanction period. If the individual re-applies and is determined mandatory for IMPACT participation, the individual must also demonstrate compliance with IMPACT requirements by completing Applicant Job Search Orientation and successfully participating for twenty (20) days in assigned AJS activities for a minimum of four (4) hours each day within a sixty (60) day time frame.

2545.20.00 NON-COMPLIANCE OF SNAP ONLY RECIPIENTS (S, I)

SNAP IMPACT volunteers who do not comply with their SNAP IMPACT requirements will be removed from the IMPACT Program without loss of benefits or the imposition of a sanction. Their supportive services will also be terminated.

ABAWDs who have used their three (3) months of SNAP eligibility without fulfilling their work requirements will be determined ineligible for SNAP benefits. If the ABAWD is the only member of the Assistance Group (AG), the individual's failure to fulfill work requirements will result in the loss of SNAP benefits and supportive services, and the individual's case will be closed. If the AG is comprised of more than one member, the case will remain open and the individual's income, resources, and expenses will continue to be included in the SNAP budget. (Refer to *Section 2438.17.10* for ABAWD Work Requirements.)

2550.00.00 IMPACT SUPPORTIVE SERVICES (S, C, I)

Supportive services are provided to "support" the individual while participating in IMPACT activities, including employment.

The needs of participants are to be discussed with IMPACT staff and supportive services arranged when the Self-Sufficiency Plan is being developed. (See *Section 2510.00.00* for supportive services for applicants.) Supportive services are provided to help remove barriers

that are preventing the individual from moving toward self-sufficiency.

Initial determination for supportive services is based on an Assessment of the client's need for such services in order to participate in the IMPACT Program activities. However, because supportive services are not entitlements, they should be provided only when the participant has no other resources for obtaining them. Supportive services received from another agency cannot be duplicated while participating in IMPACT.

The Self-Sufficiency Plan (SSP) must include the type of supportive services to be provided to the participant and the dates they will be provided.

Supportive services may be provided by:

1. Giving the client "pre-paid" bus tickets or a gas card, and
2. Reimbursing vendors for the costs of services rendered (including child care).

Subsequent authorization of supportive services is to be based on satisfactory participation in approved program activities and continued need.

Supportive services should not become a support upon which the participant comes to depend, thus making self-sufficiency harder to attain. Therefore, when supportive services are being facilitated, the IMPACT case manager should discuss the requirement for the participant to begin to meet these needs independently.

Verification of attendance and program compliance is necessary at least monthly for reauthorization of supportive services. If a TANF participant finds it difficult to attend scheduled activities, a re-evaluation of the individual's exemption status, good cause, or SSP may be warranted. It will also be necessary to re-evaluate the SSP of a SNAP IMPACT volunteer who is not attending scheduled activities prior to removing the individual from IMPACT for non-compliance.

Supportive services are to be terminated if attendance at IMPACT activities and compliance with the SSP cannot be verified.

If attendance forms are not received from TANF participants on the due date, IMPACT staff will:

Request a Notice of Non-Compliance with IMPACT Requirements within two (2) working days of receiving information that the participant is non-compliant, and

Request the initiation of the appropriate minimum sanction period on the same day.

If a non-compliant TANF participant fails to:

- (a) Provide good cause, and/or
- (b) Submit the required attendance form(s)

By the due date, supportive services are to be discontinued no later than the last day of the month in which the individual was eligible for TANF benefits.

TANF individuals who demonstrate compliance while serving a sanction, and continue to receive benefits following a timely appeal of the sanction, remain eligible for IMPACT supportive services.

However, TANF individuals who remain non-compliant will continue to be ineligible for supportive services.

For **SNAP IMPACT** volunteers, non-compliance will result in their removal from the IMPACT program and the simultaneous termination of supportive services without loss of benefits, or the imposition of a penalty.

ABAWDs who have exhausted their three (3) months of SNAP eligibility without fulfilling their work requirements will lose their eligibility for supportive services in addition to their SNAP benefits.

2550.05.00 ESTABLISHING VENDORS FOR IMPACT SUPPORTIVE SERVICES (S, C, I)

The IMPACT Office is responsible for establishing a relationship with vendors to provide supportive services such as interview clothing and uniforms (CA), bus passes and tokens (BU), vehicle repairs (VE), gas cards (GC), and HSE testing (HE).

2550.10.00 PROCESSING SUPPORTIVE SERVICES (S, C, I)

The IMPACT case manager will facilitate the provision of supportive services and the appropriate supervisory staff will review and approve the services to ensure compliance with supportive services guidelines.

2550.10.05 Correcting Discrepancies in Authorized Services (S, C, I)

When there is a discrepancy between the authorized services and the services received, the situation must be brought to the attention of the IMPACT case manager and supervisory staff and resolved with the vendor and/or participant. Participants who purchase unauthorized items could be asked to return items, or arrange to purchase them with their own funds.

Payment should not be withheld from vendors who have allowed the purchase of unauthorized items or services; instead, a discussion should take place with the vendor to emphasize the importance of providing only those services and items that are allowed and approved. If a vendor persists in providing unauthorized services or allowing unauthorized items to be purchased, the relationship should be terminated.

2550.10.10 Avoiding Supportive Services Payment Errors (S, C, I)

All authorizations for supportive services for IMPACT participants must follow the guidelines and dollar limits listed in *Sections 2550.20.05, 2550.20.10, 2550.20.10.05 and 2550.20.15*. In the dollar maximum statement for each category of supportive services, "per a 12 month period" is defined as 12 months from the initial expenditure under each category. A subsequent 12 month period for a category begins when a new expenditure occurs, not immediately after the first 12 month period ends (also called a "rolling" 12 month period).

2550.20.00 TANF AND SNAP IMPACT SUPPORTIVE SERVICES LIMITS (S, C, I)

The limits designated for each category of service described below are the same for both the TANF and SNAP programs unless otherwise noted.

TANF recipients who receive TANF and SNAP benefits concurrently are not eligible for the supportive service

limits in each category under both programs. For example, TANF supportive services will take precedence over SNAP unless the TANF portion of the case closes and the individual volunteers for IMPACT.

For SNAP only recipients and ABAWDs, the Federal Food and Nutrition Service (FNS), supports the use of Federal SNAP Employment and Training (E&T) funds to provide training and educational activities to assist SNAP IMPACT participants in becoming employed.

In addition, SNAP volunteers and ABAWDs who obtain employment while participating in IMPACT may now receive clothing and transportation assistance, if needed, up to a maximum of 90 days from the begin date of their employment unless they lose eligibility for IMPACT services because of:

1. Case closure, or
2. Removal from IMPACT, whichever comes first.

Both TANF and SNAP participants are subject to a rolling 12 month period for each category of assistance.

Supportive services are not provided to self-employed participants.

Effective October 1 2018, SNAP participants are limited to a combined monthly total of \$125 for supportive services (excluding Dependent Care).

Costs exceeding the SNAP monthly \$125 combined limit are not to be prorated or projected into future months.

The total dollar amounts received by the participant in each category for a rolling 12 month period are recorded in the System of Record and reflect supportive services paid under both programs.

2550.20.05 SNAP Only Recipients (S, I)

SNAP only recipients who volunteer for IMPACT, and ABAWDs, are eligible for IMPACT supportive services in the following categories and amounts up to the monthly maximum of \$125 effective October 1 2018, for all services

combined:

1. Clothing (CA): Up to a maximum of \$300 per 12 month period not to exceed \$125 per month for dress clothing, uniforms, and shoes, if needed, to attend a job interview, begin and maintain employment up to a maximum of 90 days after the job begins (per *Section 2550.20.00*), or participate in an assigned IMPACT activity requiring specific clothing such as uniforms, scrubs, steel-toed shoes or boots, safety glasses, or other safety attire. Accessories such as belts, gloves, undergarments, hosiery, cosmetics, jewelry and other employment related expenses are not allowable.
2. Transportation services (BU, GC) may be authorized if needed to help the client find employment or participate in an assigned IMPACT activity as long as the site is not within one mile of the client's home. Participants are expected to utilize the most cost effective mode of transportation, especially in urban areas where public transportation is readily available.
 - (a) Public transportation (BU) may be provided up to the \$125 maximum per month.
 - (b) Private transportation (GC) services provided by the client, friends or relatives, and paid with a gas card (GC) may be authorized up to a maximum monthly amount of \$125 when it is more cost effective than public transportation. Mileage must be documented per *Section 2550.20.15* below.
3. High School Equivalency (HSE) Diploma (HE) is a one-time only (lifetime) payment up to a maximum of \$90 for a participant to take the HSE test regardless of whether the individual passes or fails the test. The individual must provide justification that the individual is prepared to take the test before payment can be approved.

2550.20.10 TANF IMPACT Mandatory Participants (C, I)

TANF IMPACT mandatory participants are eligible for supportive services in the following categories and amounts:

1. Clothing (CA): Up to \$300 per 12 month period per

participant for dress clothing, uniforms, scrubs, steel-toed boots and shoes if needed to attend a job interview, begin or maintain employment, or to participate in an IMPACT activity. Accessories such as belts, gloves, under garments, hosiery, cosmetics and jewelry are not allowable.

2. Transportation services (BU, GC) may be authorized if needed to help the participant obtain and maintain employment, or to participate in an IMPACT activity when the employment or activity site is not within one mile of the client's home. Expenses are projected using best available information (may include mileage data from MapQuest, Google Maps, or other appropriate sources). Participants are expected to utilize the most cost effective mode of transportation, including public transportation where available.
 - (a) Public transportation (BU) may be provided up to a \$200 maximum per month.
 - (b) Private transportation (GC) services provided by the client, friends or relatives, and paid with a gas card (GC) may be authorized up to a \$200 maximum per month when it is more cost effective than public transportation.

3. Vehicle Repair (VE) may be authorized up to \$750 per 12 month period per participant only when the vehicle is:
 - (a) Owned or co-owned by the participant, participant's spouse, or participant's parent if the client is under age 21;
 - (b) Licensed with a current plate and registration;
 - (c) Insured (name of insurer, policy number and expiration date must be provided);
 - (d) The repair(s) is necessary to make the vehicle operable in order to have transportation to begin or maintain employment, or to participate in assigned IMPACT activities, and
 - (e) Public transportation is not available or accessible.

4. High School Equivalency (HSE) Test (HE) is a one-time only (lifetime) payment up to a maximum of \$90 for a recipient to take the HSE test regardless of whether the individual passes or fails the test. The individual must provide justification that the individual is prepared to take the test before the payment can be approved.

2550.20.10.05 Vehicle Repair Estimates (C, I)

Two (2) free estimates are required for vehicle repair(s). The repair for which the estimate is being requested must be clearly stated. Minimal repairs are to be authorized only for the condition(s) that will make the vehicle operable. All estimates must be pre-approved. **A repair cannot be considered or approved if the cost exceeds the maximum amount "allowable" or still "available" to the client during the rolling 12 month cycle.**

The vendor must also indicate on the VEHICLE REPAIR ESTIMATE Form (SF 50755) whether the vehicle is worth repairing based on its age, mileage and overall condition. Note that the vendor's estimate of worth does NOT preclude further evaluation by IMPACT staff regarding the value of the car relative to the estimated cost of the repair and if the repair is appropriate.

*Do not approve \$750 worth of repairs that include maintenance services unless that service is integral to the repair; for example, replacing or repairing a radiator would most likely require replacing the fluid.

All repairs require prior approval by IMPACT Office staff once verification of ownership, auto insurance, and two estimates containing a statement about the car's worth have been received.

If the car needs to be towed in order to make the necessary repair(s) or to obtain a second estimate, the second estimate may be waived,* but this must be noted in the System of Record (SOR). The original estimate, the IMPACT approval notice authorizing the service signed and dated by the vendor, and the invoice are recorded in the appropriate automated system once the service has been completed.

*In some of the more remote or rural areas where there may be only one vendor available, the second estimate may be waived as long as the reason is documented in the SOR.

If parts are purchased separately for installation by someone other than an authorized vehicle repair vendor, the person making the repair must document that the parts were installed in the approved vehicle. However, the practice of allowing an individual to make vehicle repairs is not recommended.

SERVICES COVERED:

Minimal vehicle repairs only (battery replacement, tire replacement including balancing, mufflers, brakes, etc.) at a cost of less than \$750. Repairs must be necessary (not desirable) and limited to that service which will make the vehicle operable.

SERVICES NOT COVERED:

- Preventive maintenance services scheduled or otherwise (any fluid changes - oil, transmission, anti-freeze, brake, windshield wiper, etc.)
- Tune ups
- Alignments (even when new tires are purchased)
- Shocks, struts, motor mounts, catalytic converters, tie rods
- Body work, unless it is absolutely necessary for the safe operation of the vehicle and not covered by insurance
- Diagnostic fees
- Major transmission/engine repairs or replacements
- Insurance premiums
- License plates or driver's licenses
- Vehicle down payments/purchases
- Car payments

2550.20.15 Private Transportation Expenses (S, C, I)

TANF and SNAP recipients who are provided with a gas card (GC) to cover travel expenses in order to participate in assigned IMPACT activities must accurately project round trip mileage multiplied by the number of trips. Effective March 1 2018, the new mileage rate is \$.30 per mile.

Round trip mileage projections must be reflected in the eligibility system and must include the following addresses, if applicable:

- (a) Client's home,

- (b) Child care site,
- (c) Location of the IMPACT activity, and the
- (d) Employment site.

Fines for illegal acts such as parking and traffic violations, and driver's license suspension penalties are not to be paid under any category or circumstance.

**2550.25.00 TANF IMPACT TRANSITIONAL SUPPORTIVE SERVICES
(C, I)**

A TANF IMPACT participant whose assistance group (AG) loses eligibility for TANF benefits due to the participant's employment, may receive assistance with transportation and vehicle repair expenses for up to 90 days. The costs must be necessary and directly related to employment.

1. Transportation assistance may be provided up to 90 days after the TANF AG closure date. Limited to \$200 per month, not to exceed \$600 during the 90 day period. See *Section 2550.20.00* for additional information.
2. Vehicle Repair assistance may be provided for up to 90 days after the TANF AG closure date if the vehicle becomes inoperable. Repairs must not exceed \$750 per service year. See *Sections 2550.20.00 and 2550.20.10.05* for additional information.

**2550.30.00 SUPPORTIVE SERVICES FOR INELIGIBLE
PARTICIPANTS (S, C, I)**

No payment for program activities or supportive services may be made for a month in which the participant is/was ineligible for TANF or SNAP benefits except for the following:

Participants whose 24-months of eligibility have expired, but the individual's TANF AG remains open, or

Participant's TANF AG closes due to employment, but the individual is eligible for TANF IMPACT transitional supportive services as stated in Section 2550.25.00.

Clients who participated in Applicant Job Search (AJS) may be paid for the period in which they participated (per *Section 2500.10.00*), and former TANF IMPACT participants may be paid for the duration of their OJT contract.

2550.40.00 CCDF Child Care for SNAP Recipients (S,I)

Priority child care assistance is available through the Child Care and Development Fund (CCDF) program to support SNAP recipients participating in approved IMPACT activities. Child Care assistance is provided through subcontractors or "Intake Agents" in different regions throughout the State. Payments are based on the age of the child and market rates set for each county based on the type of care (licensed center, licensed home, ministry, and legally licensed exempt).

CCDF services will be available in all counties to SNAP recipients referred by the IMPACT contractor. Participant's current gross monthly income from all countable sources must be below 130% of the federal poverty level. Existing CCDF market rates will be applied to SNAP vouchers. SNAP referrals will only be issued to families not currently receiving CCDF voucher services.

*Eligible child: A recipient of SNAP childcare who is under the age of thirteen (13) when childcare is approved. The parent and child must be in the same assistance group and the parent must be participating in IMPACT.

Individuals who secured employment prior to IMPACT participation, are not eligible for child care or other supportive services to assist in maintaining such employment. Child care is allowable while participating in assigned activities and employment obtained up to 90 days while participating in IMPACT.

IMPACT staff is responsible for completing the DFR/CCDF SNAP Referral (SF 56481) and sending it from FSSA Outlook email to the Intake Agent's State email address. If a vendor does not have a State email address, IMPACT staff must type "\$ecure" (replace the S with the dollar symbol) in the subject line of the message to encrypt the message. (Due to security requirements, the Referral form is not to be faxed or mailed to the Intake Agent.) The intake agent will treat the emailed name of the IMPACT case manager and address as the IMPACT staff's signature.

Referrals must be complete. If all appropriate sections on the Referral are not completed, the referral will be considered incomplete and the client will be denied services.

- All SNAP referrals will be for a subsidy period of four (4) weeks.
- All SNAP activities will have a Begin Date and Projected End Date noted on the referral.
- Subsequent referrals are required to be issued one week prior to referral expiration for participants who are participating beyond the initial four (4) week period. This referral process is followed until participation ceases.
- Referrals for employment have a limitation of 90 days after the begin date.
- The "General Comments" section of the referral should indicate the required number of weekly hours per week of child care.
- Upon authorization completion, the Intake Agent should complete the "Notification of Action" section and FAX the Referral Form to the Service Center at 800-403-0864 to be attached to the case.

2550.40.05 Choosing a Dependent Care Provider (S, I)

IMPACT staff should discuss the participant's dependent care needs and provide the individual with information on the available resources and what to look for in selecting a provider. The IMPACT case manager will ensure that the necessary child care is in place prior to participation in the IMPACT Program.

Participants should be referred to the Office of Early Childhood and Out of School Learning website:
<http://www.in.gov/fssa/childcarefinder/>

Participants are responsible for choosing an approved dependent care provider and should be made aware that the list of Licensed child care homes, facilities, and Unlicensed Registered Ministry or Legally Licensed Exempt providers given to them is not an endorsement of the quality of the child care provided.

**2550.45.00 CCDF CHILD CARE FOR TANF ELIGIBLE RECIPIENTS
 (C,I)**

Priority child care assistance is available through the Child Care and Development Fund (CCDF) to support approved IMPACT activities of a parent or caretaker who receives TANF assistance. Child care assistance is provided through subcontractors or "Intake Agents" in different regions throughout the state. Payments are based on the age of the child and market rates set for each county based on type of care (licensed center, licensed home, ministry, and legally licensed exempt).

CCDF services are based on a hierarchy of service need applicable statewide. Priority is given to families in which the parent or caretaker is TANF IMPACT mandatory.

If a family does not qualify for a priority category, they may be placed on a waiting list and will be notified when funds become available.

Parents who are TANF eligible and exempt from IMPACT participation, but in need of child care assistance, may volunteer for IMPACT. These parents must be made aware that once they volunteer for IMPACT and their child care barrier is removed, their status will be changed to mandatory and will not change back to "exempt" unless a new barrier or exemption reason applies.

Minor parents who wish to attend high school and whose TANF grant is in their parent's name, may also volunteer for IMPACT. Changing their status to 02 in the Eligibility System will make them mandatory and eligible for CCDF services. They also need to know how this status change will affect their 24-month clock. For CCDF purposes, the TANF/IMPACT case must be in the minor parent's name, not her mother or father's.

Parents or caretaker relatives who do not qualify for a priority category should still be encouraged to apply and add their names to the waiting list. The number of slots available may vary from year to year.

A non-TANF family seeking CCDF assistance must provide its own verification of service need and household income instead of the IMPACT staff.

A TANF IMPACT mandatory recipient who is in an approved IMPACT activity or employed, must be in an active (not pending) status in the Eligibility System. They must also meet the CCDF "initial" income eligibility standard of 127%

(or below) of the Federal Poverty Level (FPL).

Priority child care services may also be available for a TANF applicant participating in AJS. (See *Section 2510.00.00.*) If child care is needed, the IMPACT case manager will make a referral to the CCDF Intake Agent.

Once child care is authorized, the family may continue to receive child care services until their next re-certification period [which may not be greater than fifteen (15) weeks for TANF recipients] with the CCDF Intake Agent.

The maximum income limit for a family already receiving CCDF vouchers is 170% of the FPL. If the family's income increases during the CCDF certification period, they may continue to receive vouchers until the Intake Agent recertifies them. (Do not confuse child care recertification with DFR's public assistance re-determination process.)

2550.45.05 Priority Child Care Referrals (C, I)

The IMPACT staff is responsible for completing the DFR/CCDF REFERRAL Form [SF 53132] and sending it from FSSA Outlook E-mail to the Intake Agent's State E-mail address. In instances in which a vendor no longer has a State E-mail address, IMPACT staff must type "\$secure" (replace the S with the dollar symbol) in the subject line of the message to encrypt the message. (Due to security requirements, the REFERRAL Form is not to be FAXED or mailed to the Intake Agent.) The Intake Agent will treat the e-mailed name of the IMPACT case manager and address as the IMPACT staff's signature.

Referrals must be complete: If all appropriate sections on the REFERRAL are not completed, the referral will be considered incomplete and the client will be denied services.

A new section on the referral is the "Current TANF benefit amount". If the "Current TANF benefit amount" is zero, the worker must enter a zero in the field on the referral.

A CCDF subsidy for TANF recipients may be authorized for fifteen (15) weeks only. Upon authorization completion, or expiration of a referral, the Intake Agent should complete Section B of the REFERRAL Form and FAX it to the Service Center at 800-403-0864 to be attached to the case.

NOTE: See APPLICANT SERVICES, *Section 2510.00.00*, for CCDF policy regarding Applicant Job Search (AJS) referrals.

**2550.45.10 General Comments Section of REFERRAL Form
(C, I)**

The "general comments" section should indicate whether the client requires more than the customary thirty (30) hours per week of child care.

2550.45.15 Reporting Changes to the Intake Agent (C, I)

After the initial referral, IMPACT staff is to notify the Intake Agent of changes in activities, employment starts and stops, breaks in participation, and loss of TANF eligibility or Assistance Group (AG) closures via FSSA Outlook E-mail to the Intake Agent's State E-mail address. In instances in which a vendor no longer has a State E-mail address, IMPACT staff must type "\$ecure" (replace the S with the dollar symbol) in the subject line of the message to encrypt the message.

However, changes such as an increase or decrease in income are NOT to be reported prior to the recertification appointment with the Intake Agent.

2550.50.00 TRANSITIONAL CHILD CARE (C, I)

TANF participants who are employed and "transitioning off TANF" may receive child care vouchers but, depending on the availability of funds, they may be placed on a waiting list.

For CCDF purposes, "transitioning off TANF" means that the client's TANF AG is active in the current month, but will be closed at the beginning of the upcoming month.